

EPA Registration No.
85556-2
Vol. 1

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

A. Lowell Snow
 Consultant for AP Goldshield LLC
 6981 Scenic Pointe Place
 Manassas, VA 20112

MAY 30 2012

SUBJECT: Goldshield 75
 EPA Registration Number: 85556-2
 Application Date: January 12, 2012
 Receipt Date: March 5, 2012

Dear Mr. Snow:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is unacceptable due to the concerns listed below:

- Additional use sites

Deficiencies

- 1) There are several instances in which text is missing from your label. For example, the Ingredients Statement is incomplete and the chart on pages 6 through 8 is incomplete. In both instances text is missing from the far right side of the page.
- 2) You have not complied with the comments associated with the Registration Notice for this product issued on June 4, 2008. Comments 3, 4, 5, 6, 7, 8 and 11 have not been addressed. The Agency is unable to determine if you have complied with comments 9 and 10 as the complete label text is not included on these pages.
- 3) You have proposed adding the use: "Equipment parts, machines and surfaces (non food contact)". Based on our correspondence it appears that you desire to use this product on non food contact surfaces of **food processing equipment**. Such a use is not acceptable. Additional details of the proposed use including detailed directions

CONCURRENCES							
SYMBOL	✓						
SURNAME	✓						
DATE	✓						

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

for use are necessary (how is the product applied, to what surfaces, at what rate, by whom and how often.) The Agency does not agree that there are any surfaces of food processing equipment that are "non food contact". Thus the addition of such a use requires a petition for a tolerance or exemption from the requirement of a tolerance. Additionally, since this product is not effective against the target pests in the food processing industry (public health related antimicrobial pests) you would need support the reasons why this product should be used on this equipment. If it is not your intention for this product to be applied to food processing equipment, include such a restriction on your label. You would still be required to provide specific directions for use and clearly indicate the types of equipment to which this product is applied.

- 4) You have also added: "Textiles, woven and non woven made from the inert materials such as....nylon/spandex." Provide the Reg. No. of a product for which this use has previously been approved.
- 5) Revise your Storage & Disposal language to be in agreement with PR Notice 2007-4 and Chp. 13 of the Label Review Manual: <http://www.epa.gov/oppfead1/labeling/lrm/>

Submit revised labeling and detailed explanations addressing all of the concerns identified above. Should you have any questions concerning this letter, please contact Tracy Lantz at (703) 308-6415.

Sincerely,



Velma Noble
Product Manager (31)
Regulatory Management Branch I
Antimicrobials Division (7510P)

7510P:T.Lantz:5/30/12:85556-2 unacceptable label amend

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

EPA Form 1320-1A (1/90) Printed on Recycled Paper OFFICIAL FILE COPY

RISK ASSIGNMENT FORM
Antimicrobial Division/Regulatory Management Branch I

A	Completed by Product Manager									
PRODUCT REVIEWER: <i>Tracy</i>							RMBI <u>TEAM 31</u>			
Type of Action: <i>Label Amendment</i>							EPA File Symbol/Reg No. <i>85556-2</i>			
Decision No. <i>462241</i>			Submission No. <i>912753</i>			Fee for Service Action Code:				
FQPA Action Code: <i>302</i>			Non-FQPA Action Code:			PRIA FEE AMOUNT:				
			MONTH		DAY		YEAR			
APPLICATION DATE			<i>1</i>		<i>12</i>		<i>2012</i> 2011			
EPA PIN DATE			<i>3</i>		<i>5</i>		<i>2012</i> 2011			
DATE PM RECEIVED FROM FRONT END							2011			
DATE SENT TO SCIENCE										
DATE RECEIVED FROM SCIENCE										
DATE DUE TO PM			<i>6</i>		<i>3</i>		<i>2012</i>			
Type of Data:	PSB Product Chemistry	PSB Acute Toxicology	PSB Efficacy	RASSB Environmental Fate	RASSB Ecological Effects	RASSB Chronic Toxicology	RASSB Exposure/Residue			
<i>Label Amendment - Give to Tracy</i>										
ATTACHMENTS: -LABELING -CSF(S) -DATA -OTHERS										
B	For Arctic Slope Contract Only									
	Contract No.: 0052			ARCTIC SLOPE/MANAGER						
	Final Task: Signature _____ (Total hrs)									
C	Reviewer Comments:									
DATE FEE PAID:				RESPONSE CODE:			RESPONSE DATE:			

Fee for Service

{912753,~

This package includes the following

☐ New Registration

☒ Amendment

☐ Studies? ☐ Fee Waiver?

☐ volpay % Reduction: _____

for Division

☒ AD

☐ BPPD

☐ RD

Risk Mgr. 31

Receipt No.

S- 912753

EPA File Symbol/Reg. No.

85556-2

Pin-Punch Date:

3/5/2012

☒ This item is NOT subject to FFS action.

Action Code:

Requested:

Granted:

Amount Due: \$ _____

Parent/Child Decisions:

☐ Inert Cleared for Intended Use



Uncleared Inert in Product

Reviewer: Team 1 / Vito M. Ale

Date: 3-6-12

Remarks:

Receipt for Section 3

S: 912753

Regulatory Type: Product Registration - Section 3

Application Type: Amendment

Company: 85556 AP GOLDSHIELD LLC

Risk Manager: Antimicrobials Division, Risk Management Team 31

Product #: 85556-2

Product Name: GOLDSHIELD 75

Override#:

Me Too Section3: 70871-19

Me Too Product Name: EST PROTECTANT RTU 75

Application Date: 12-Jan-2012

Front End Date: 05-Mar-2012

FFS Due Date:

OPP Target Date:

Fast Track:

Receipt Description: Label amendment

Form A:

Signature Date:

Resubmission: Yes No

Fee For Service: Yes No

Billable: Yes No

V

Print Letter

Enter More Information

Tracking

OPP Rec'vd Date: 05-Mar-2012

Risk Manager Send Date: 07-Mar-2012

Negotiated Due Date:

New Ingredient:

Request Date:

New Ingredient:

Received Date:

Signature Date:

Signature Date:

Receipt Content

Paper Label

Des

View/Edit



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

March 7, 2012

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

A. LOWELL SNOW
A. LOWELL SNOW CONSULTING
AP GOLDSHIELD LLC
6981 SCENIC POINTE PLACE
MANASSAS, VA 20112-

PRODUCT NAME: GOLDSHIELD 75
COMPANY NAME: AP GOLDSHIELD LLC
OPP IDENTIFICATION NUMBER:
EPA FILE SYMBOL: 85556-2
EPA RECEIPT DATE: 03/05/12

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Antimicrobials Division, Risk Management Team 31, at (703) 308-6233.

Sincerely,

P.K. Mrooke
Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division



Goldshield™
Goldshield 75™
MICROBIOSTATIC AGENT *
A Silicone Quaternary Ammonium Salt

Active Ingredient: 3-(Trihydroxysilyl)propyldimethyloctadecyl ammonium chloride.....

Other Ingredients:

TOTAL

INGREDIENTS:

KEEP OUT OF REACH OF CHILDREN
WARNING

EPA Reg. No. 85556-2

EPA EST=====

NET CONTENTS: 2, 4, 8, 16, 20, 22, or 32 fluid oz.; 1, 5, 55, 150, 275, 300, 475 gal.
Lot No.

FIRST AID

Have the product container or label with you when calling the poison control center or doctor, or going for treatment.

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
- Call poison control center or doctor for treatment advice.

IF INHALED:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.
- Call a poison control center or doctor for further treatment advice.

IF ON SKIN:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

A microbiostatic agent is an agent that inhibits the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae. This product does not protect users or others against food-borne or disease-causing bacteria.

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING. Causes substantial but temporary eye injury. Harmful if absorbed through skin or inhaled. Do not get in eyes. Avoid contact with skin and avoid breathing vapor. Wear protective eyewear (goggles or face shield). Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

Commercial and industrial uses: This pesticide is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

De-activation may be required during clean up if a spill occurs. De-activation of *GOLDSHIELD 75™* can be achieved by the addition of anionic surfactant (such as soap, sulfonates, sulfates) in quantity equivalent to that of *GOLDSHIELD 75™*.

Homeowner use: This pesticide is toxic to fish. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of pesticide.

DIRECTIONS FOR USE

Approved commercial and Industrial Applications

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Wear protective eyewear (goggles or face shield) and gloves when using this product. Dry treated areas and articles such as clothing before use. Remove children and pets from treated area until completely dry.

Dry substrates at temperatures from ambient to a maximum of 160° C (320° F) to effect complete condensation of silanol groups and to remove water, solvents and/or traces of methanol from hydrolysis. Optimum application and drying conditions, such as time and temperature, should be determined for each application before use. If necessary, reapply *GOLDSHIELD 75™* every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.

GOLDSHIELD 75™ when used as a concrete additive is added directly during concrete preparation. Use 6 fluid ounces *GOLDSHIELD 75™* per cubic feet of concrete. Add to water before addition of concrete. Addition of *GOLDSHIELD 75™* reduces deterioration of sewer pipes and manholes by inhibiting microbiologically induced corrosion.

Approved commercial and industrial applications

The active ingredient in *GOLDSHIELD 75™* is effective against odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew) and algae as a static agent. *GOLDSHIELD 75™* can be used as a final bacteriostatic finish on the following items to impart bacteriostatic/fungistatic (mold and mildew) activity.

- Air filters for furnaces, air-conditioners, air purification devices, automobiles, recirculating air handling systems
- Air filters/materials
- Aquarium filter material
- Bed sheets, blankets, and bedspreads
- Buffer pads (abrasive and polishing)
- Carpets and draperies
- Cellulose sponges
- Concrete additive for sewer pipes, manholes and concrete sewer structures; not to be used in treatment of storm drains
- Concrete additive for repair and renewal of sewer pipes and manholes and concrete sewer structures; not to be used in treatment of storm drains
- Equipment parts, machines and surfaces (non food contact)
- Exterior walls (such as stone, concrete, brick)
- Fiberfill for upholstery, sleeping bags, apparel, where the fiber is cotton, natural down, nylon, polyester, rayon, or wool
- Fiberglass ductboard
- Fire hose fabric
- Humidifier belts
- Mattress pads and ticking
- Mens underwear and outerwear
- Non-woven disposable diapers
- Non-woven polyester
- Outerwear apparel (jackets, sweaters, sweatshirts, coats, raincoats, overcoats, jerseys, ponchos)

- *GOLDSHIELD 75™* can be used in paints and coatings as an in can preservative for protection of paint film and coating film. Types of paints and coatings include : latex indoor/outdoor paints and stains, wood-stains, architectural paints, lacquer and maintenance coatings, films, laminates and finishes including alkyd, urethane, enamel, epoxy, siloxaline , amino resins, textile coatings, extrusion coatings, architectural coatings and overlays, anti-corrosion coatings, fire-resistant coatings, aliphatic coatings, vinyl-ester and polyester coatings, gel coatings, amino resins, resins used as additive mixes for cement, epoxy laminating resins, and blends and copolymers thereof;
- Polyurethane and cellulose foam for household, industrial, and institutional sponges and mops
- Polyurethane and polyethylene foam, when covered
- Polyurethane foam for packaging and cushioning in non-food contact applications
- Polyurethane foam used as a growth medium for non-food crops and plants
- Pre-moistened towelettes and tissue wipes (these do not impart pesticidal properties)
- Roofing materials - defined as shingles, roofing granules, wood shakes, felt, stone and synthetic overcoats
- Sand bags, tents, tarpaulins, sails, and ropes
- Athletic and casual shoes
- Shoe insoles
- Shower curtains
- Socks comprised of nylon, nylon/orlon, cotton/nylon, linen/Lycra, acrylic/polypropylene/nylon/Lycra, wool/silk/nylon/Lycra and wool/acrylic/nylon/Lycra
- Textiles, woven and non-woven made from inert materials such as polypropylene, textured and spun bond, Kevlar®, polystyrene or polyester, polyester resin treated, polyester/spandex or nylon/spandex.
- Throw rugs
- Toweling made of 100 percent cotton, 100 percent polyester, and blends of the two fibers
- Toilet tank and seat covers
- Umbrellas
- Upholstery made of acetates, acrylics, cotton, fiberglass, nylon, polyester, polyethylene, polyolefins, polypropylene, rayon, spandex, vinyl, wool
- Vacuum cleaner bags and filters
- Vinyl paper-wallpaper for non-food contact surfaces
- Disposable wiping cloths that can be used for multiple purposes such as dusting or washing furniture, cars, walls, windows, floors, appliances, dishes, counter tops; the wiping cloths do not impart pesticide properties
- Women's hosiery
- Women's intimate apparel

DIRECTIONS FOR USE

Approved commercial applications used in homes, offices, automobiles and institutions
e.g., schools, hospitals, daycare centers, churches, correctional facilities

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Wear protective eyewear (goggles or face shield) and gloves when using this product. Dry treated areas and articles such as clothing before use. Remove children and pets from treated area until completely dry. Clean surfaces prior to application.

For Pump Spray Application: Using pump sprayer, spray entire area 4" - 6"s from the surface making sure the surface is completely covered. Apply and then let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test for staining and color-fastness of fabrics and carpets by treating and drying a small, concealed area prior to application. *GOLDSHIELD 75™* treats approximately 200 square feet per diluted gallon of water. When treating coarser substrates, more *GOLDSHIELD 75™* may be required due to absorption. A fan may be used to assist in drying carpeting.

For Commercial Spray Application: For commercial application equipment (i.e. carpet/upholstery steamers, rotary jet extraction cleaners, pressure sprayers) Apply and then let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test for staining and color-fastness of fabrics and carpets by treating and drying a small, concealed area prior to application. *GOLDSHIELD 75™* treats approximately 200 square feet per gallon of water. When treating coarser substrates, more *GOLDSHIELD 75™* may be required due to absorption. Dry carpet areas and surfaces before re-entry and dry articles before use. A fan may be used to assist in drying carpeting.

For Dipping/Soaking Application: Use appropriate sized wash basin or tub for dipping/soaking the item you are treating. Use enough *GOLDSHIELD 75™* solution to completely submerge item. Completely submerge item in solution for 3

minutes. Remove item and dry. Test for staining and color-fastness of fabrics by treating and drying a small, concealed area prior to application. Do not reuse solution after dipping/soaking.

The substrate can be dried at room temperatures or at temperatures to a maximum of 160° C (320° F), for example in a clothes dryer. Remove excess liquid before attempting to dry in a clothes dryer. If necessary, reapply *GOLDSHIELD 75™* every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.

**Approved commercial applications in homes, offices, automobiles and institutions
e.g., schools, hospitals, day care centers, banks, churches, correctional facilities**

The active ingredient in *GOLDSHIELD 75™* is effective against odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew) and algae as a static agent.

GOLDSHIELD 75™ can be used as a final bacteriostatic finish on the following items to impart bacteriostatic/fungistatic (mold and mildew) activity.

- Air filters for furnaces, air-conditioners, air purification devices, automobiles, recirculating air handling systems
- Air filters/materials
- Aquarium filter material
- Bed sheets, blankets, and bedspreads
- Buffer pads (abrasive and polishing)
- Carpets and draperies
- Cellulose sponges
- Equipment parts, machines and surfaces (non food contact)
- Exterior walls (such as stone, concrete, brick)
- Fiberfill for upholstery, sleeping bags, apparel, where the fiber is cotton, natural down, nylon, polyester, rayon, or wool
- Fiberglass ductboard
- Fire hose fabric
- Humidifier belts
- Mattress pads and ticking
- Mens underwear and outerwear
- Non-woven polyester
- Outerwear apparel (jackets, sweaters, sweatshirts, coats, raincoats, overcoats, jerseys, ponchos)
- Polyurethane and cellulose foam for household, industrial, and institutional sponges and mops
- Polyurethane and polyethylene foam, when covered
- Polyurethane foam for packaging and cushioning in non-food contact applications
- Polyurethane foam used as a growth medium for non-food crops and plants
- Roofing materials - defined as shingles, roofing granules, wood shakes, felt, stone and synthetic overcoats
- Sand bags, tents, tarpaulins, sails, and ropes
- Athletic and casual shoes
- Shoe insoles
- Shower curtains
- Socks comprised of nylon, nylon/orlon, cotton/nylon, linen/Lycra, acrylic/polypropylene/nylon/Lycra, wool/silk/nylon/Lycra and wool/acrylic/nylon/Lycra
- Textiles, woven and non-woven made from inert materials such as polypropylene, textured and spun bond, Kevlar®, polystyrene or polyester, polyester resin treated, polyester/spandex or nylon/spandex.
- Throw rugs
- Toweling made of 100 percent cotton, 100 percent polyester, and blends of the two fibers
- Toilet tank and seat covers
- Umbrellas
- Upholstery made of acetates, acrylics, cotton, fiberglass, nylon, polyester, polyethylene, polyolefins, polypropylene, rayon, spandex, vinyl, wool
- Vacuum cleaner bags and filters
- Vinyl paper-wallpaper for non-food contact surfaces
- Disposable wiping cloths that can be used for multiple purposes such as dusting or washing furniture, cars, walls, windows, floors, appliances, dishes, counter tops; the wiping cloths do not impart pesticide properties

- Women's hosiery
- Women's intimate apparel

DIRECTIONS FOR USE
For homeowner applications

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Wear protective eyewear (goggles or face shield) and gloves when using this product. Dry treated areas and articles such as clothing before use. Remove children and pets from treated area until completely dry. Clean surfaces prior to application.

Approved homeowner uses

The active ingredient in *GOLDSHIELD 75™* is effective against odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew) and algae as a static agent. *GOLDSHIELD 75™* can be used as a final bacteriostatic finish on the following items to impart bacteriostatic/fungistatic (mold and mildew) activity.

	Pest controlled	Dilution Rate	Method of Application
Bed-sheets, blankets, bedspreads, curtains, draperies (washable only), underwear, socks, intimate apparel, hosiery, throw rugs, toweling, toilet tank covers, shower curtains, shoe insoles, outerwear apparel (jackets, sweaters, sweatshirts, coats, raincoats, overcoats, jerseys, ponchos). <i>GOLDSHIELD 75™</i> can be applied to fabrics made of acetates, acrylics, cotton, fiberglass, linen, Lycra, nylon, orlon, polyester, polyethylene, polyolefins, polypropylene, rayon, silk, spandex, vinyl, and wool	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	0	<p>DIP/SOAK: Use appropriate sized wash tub for the item you are treating. Use enough <i>GOLDSHIELD 75™</i> solution to completely submerge item. Keep item in solution and wring excess liquid. Drying may be accomplished by wringing excess liquid from treated item and placing in a clothes dryer to aid in the removal of excess liquid. Test fabric and carpets by treating and drying a small concealed area prior to application. Do not reuse solution after articles before use. Substrates can be handled at temperatures to a maximum of 160 °C (clothes dryer). If necessary, reapply <i>GOLDSHIELD 75™</i> every 3 months or when odor, staining and discoloration return.</p> <p>SPRAY: Clean surface prior to application. Use a pressure sprayer, spray the entire surface making sure the surface is completely covered. Let stand 3 minutes and wipe dry with cloth or sponge. Test stain by treating and drying a small concealed area prior to application. If necessary, reapply <i>GOLDSHIELD 75™</i> every 3 months or when odor, staining and discoloration due to bacteria, mold, mildew, and algae return.</p>
	Pest controlled	Dilution Rate	Method of Application
Air filters and air filter material for <ul style="list-style-type: none"> • Furnaces, air conditioners • Air purification systems • Automobiles • Recirculating air handling systems • Vacuum cleaner filters • Aquariums 	Odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae	0	<p>SPRAY: When treating filters, remove filter from pump sprayer or pressure sprayer, spray from the surface making sure the surface is completely covered. Let stand until dry. If necessary, repeat every three months or when odor, stain, bacteria, mold stains, mildew stains, and algae return.</p>
	Pest controlled	Dilution Rate	Method of Application
Carpeting	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	0	<p>SPRAY: Apply to clean carpet surface. Use a pressure sprayer, spray the entire surface making sure the surface is completely covered. Cleaners and carpet steamers, add <i>GOLDSHIELD 75™</i> solution directly to the cleaning tank, in accordance with manufacturer's instructions until dry. Test staining and color-fastness on a small concealed area prior to application. Apply approximately 200 square feet per diluted gallon on coarser substrates (e.g., wool carpeting), and</p>

			be required due to absorption. Dry carpet entry. A fan may be used to assist in drying and pets from treated area until complete <i>GOLDSHIELD 75™</i> every three months discoloration due to bacteria, mold stains, a
	Pest controlled	Dilution Rate	Method of Application
Mattress pad and mattress ticking and upholstery composed of acetates, acrylics, cotton, fiberglass, nylon, polyester, polyethylene, polyolefins, polypropylene, rayon, spandex, vinyl, wool; fiberfill to be used in upholstery, sleeping bags, apparel, where the fiber is cotton, natural down, nylon, rayon or wool	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	0	SPRAY: Clean surfaces prior to application spray the entire surface area 4"- 6" from surface is completely covered. Apply and stand 3 minutes and wipe dry with cloth or wipe with moist cloth or sponge. Test stain by treating and drying a small concealed area applying to mattress pads and ticking do not keep pets from treated area until completely dry. <i>GOLDSHIELD 75™</i> every three months discoloration due to bacteria, mold stains and
	Pest controlled	Dilution Rate	Method of Application
Tents, tarpaulins, sails, ropes.	Odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae	0	SPRAY: Clean surface prior to application. Use a pressure sprayer, spray the entire surface making sure the surface is completely covered. Stand 3 minutes and wipe dry with cloth or wipe with moist cloth or sponge. Test stain by treating and drying a small concealed area. If necessary, reapply <i>GOLDSHIELD 75™</i> as necessary, reapply <i>GOLDSHIELD 75™</i> if odor, staining and discoloration due to bacteria, stains, and algae stains return. DIP/SOAK: Use appropriate sized wash tub to submerge the item you are treating. Use enough <i>GOLDSHIELD 75™</i> to completely submerge item. Keep item in solution for 30 minutes. Remove item and wring excess liquid. Test stain by treating and drying a small concealed area. Do not reuse solution after dipping/soaking. Substrates can be hang-dried at room temperatures to a maximum of 160 °C (320 °F). Remove excess liquid before attempting to dry. If necessary, reapply <i>GOLDSHIELD 75™</i> as necessary, reapply <i>GOLDSHIELD 75™</i> if odor, staining and discoloration due to bacteria, stains, and algae stains return.
	Pest controlled	Dilution Rate	Method of Application
Roofing materials (such as shingles, roofing granules, wood shakes, felt, stone, synthetic overcoats) Exterior walls (such as stone, concrete, brick)	Odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae	0	SPRAY: Make sure the roof or wall is clean. Use a pressure sprayer, spray the entire surface making sure the surface is completely covered. Let solution of <i>GOLDSHIELD 75™</i> let stand for 30 minutes. <i>GOLDSHIELD 75™</i> treats approximately 200 square feet per gallon of water. If necessary, reapply <i>GOLDSHIELD 75™</i> every three months or when odor, staining and discoloration due to bacteria, mildew stains, and algae stains return.

	Pest controlled	Dilution Rate	Method of Application
Buffer pads (polishing and abrasive), Polyurethane and cellulose foam for household sponges and mops, vacuum cleaner bags, umbrellas, casual shoes, athletic shoes	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	0	SPRAY: Clean surface prior to application. or pressure sprayer, spray the entire surface making sure the surface is completely covered. Stand 3 minutes and wipe dry with cloth or sponge. If necessary, wipe with moist cloth or sponge. If necessary, <i>GOLDSHIELD 75™</i> every three months or when odor, stain, bacteria, mold stains, and mildew stains return.
	Pest controlled	Dilution Rate	Method of Application
Tubs, glazed tiles, vanity tops, shower curtains, shower stalls (areas), sinks, washable walls, wall paper for non-food contact, floors, window sills, cabinets, garbage cans, appliances, refrigerators (exterior), fiberglass, formica, glazed tiles, glazed porcelain, synthetic marble, plastic, vinyl	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	0	SPRAY: Using a trigger pump sprayer, spray 6" from the surface making sure the surface is completely covered. Stand until dry or let stand 3 minutes and wipe. If spotting occurs, wipe with moist cloth or <i>GOLDSHIELD 75™</i> every three months or when odor, stain, bacteria, mold stains, and mildew stains return.

MOLD, MILDEW, ODOR PROTECTOR AND INHIBITOR *GOLDSHIELD 75™* is an antimicrobial agent effective against odor causing bacteria.

GOLDSHIELD 75™ is an antimicrobial agent effective against bacteria which cause staining and discoloration.

GOLDSHIELD 75™ is an antimicrobial agent effective against fungi (mold and mildew).

GOLDSHIELD 75™ is an antimicrobial agent effective against algae.

GOLDSHIELD 75™, an antimicrobial agent, controls the source of odors on surfaces in the home, in the bathroom, in the kitchen.

Bacteriostatic, fungistatic (mold and mildew), algastatic.

GOLDSHIELD 75™ an antimicrobial agent, inhibits smelly odors caused by mold and mildew that can grow even in the cleanest of homes.

GOLDSHIELD 75™, an antimicrobial agent, inhibits the growth of odor causing bacteria.

Effective on hard non-porous washable bathroom and kitchen surfaces and fixtures around the home.

Effective on modern hard non-porous washable surfaces made of fiberglass, glazed porcelain, Formica®, stainless steel, synthetic marble.

Imparts microbiostatic properties.

Use on carpet and upholstery to inhibit odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew).

Unscented.

Use on carpet and upholstery to inhibit the growth of odor causing bacteria.

Use on carpet and upholstery to inhibit the growth of bacteria which cause staining and discoloration.

Use on carpet and upholstery to inhibit the growth of fungi (mold and mildew).

Use on carpet and upholstery to inhibit the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae.

Provides an invisible microbiostatic coating to inhibit the growth of odor causing bacteria.

Provides an invisible microbiostatic coating to inhibit the growth of bacteria which cause staining and discoloration.

Provides an invisible microbiostatic coating to inhibit the growth of fungi (mold and mildew).

Provides an invisible microbiostatic coating to inhibit the growth of algae.

Provides an invisible microbiostatic coating to inhibit the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae.

Prevents deterioration caused by bacteria and fungi (mold and mildew).

Inhibits deterioration caused by bacteria.

Resists development of microbial odors.

Resists development of stains and discoloration due to bacteria.

Resists development of stains due to fungi (mold and mildew).

Resists stains due to algae.

Resists development of microbial odors, stains and discoloration due to bacteria, fungi (mold and mildew), and algae.

Provides/creates an invisible barrier to inhibit the growth of odor causing bacteria.

Provides/creates an invisible barrier to inhibit the growth of bacteria which cause staining and discoloration.

Provides/creates an invisible barrier to inhibit the growth of fungi (mold and mildew).

Provides/creates an invisible barrier to inhibit the growth of algae.

Provides/creates an invisible barrier to inhibit the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae.

Provides/creates an invisible barrier to inhibit the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

Pesticide Storage: Store in original, tightly closed containers below 30°C (86°F) and above 0°C (32°F) in a secure area inaccessible to children and away from food or feed.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. **[For homeowner use the statement will read: "Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site."]**

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke. **[For homeowner use statement will read: "Container Disposal: Securely wrap original container in several layers of newspaper and discard in trash."]**

Note: Any claims for paint use must be for the preservative of the paint in the can. *GOLDSHIELD 75™* is to be used as an in can preservative for paints to control the growth of odor causing bacteria, bacteria which causes staining and discoloration, fungi (mold and mildew) and algae.

FOR MORE INFORMATION CONCERNING THIS PRODUCT, PLEASE CONSULT THE MATERIAL SAFETY DATA SHEET (MSDS). THE MSDS CAN BE OBTAINED BY WRITING : AP Goldshield, LLC, 9570 Pan American Dr., El Paso, Texas 79927

IMPORTANT: WARRANTY AND DISCLAIMER INFORMATION

AP Goldshield, LLC warrants that the product conforms to its chemical description and is reasonably fit for the purposes stated in this bulletin when used in accordance with directions under normal conditions of use; but this warranty of fitness for a particular purpose does not extend to the use of this product contrary to bulletin instructions, or under abnormal conditions, or under conditions not reasonably foreseeable to the seller, and buyer assumes the risk of any such use.

AP Goldshield, LLC SPECIFICALLY DISCLAIMS ANY OTHER EXPRESS OR IMPLIED WARRANTY, INCLUDING THE WARRANTY OF MERCHANTABILITY

**A. Lowell Snow
Consultant**

**6981 SCENIC POINTE PLACE
MANASSAS, VIRGINIA 20112**

**PHONE: 703-791-7955
FAX: 703-791-0370
Mobile: 703-915-8866**

E-MAIL: ALSNOW@COMCAST.NET

January 12, 2012

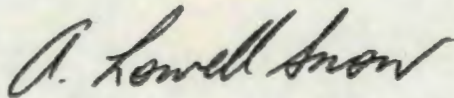
Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Attn: Velma Noble PM 31

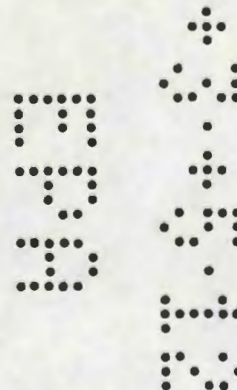
Attached are Form 8570-1, 5 copies of the proposed amended label and an Authorization Letter for the author. AP Goldshield has EPA Reg. No. 85556-2 and is Amending the registration as indicated.

Please contact me if any further information is needed for your review.

Sincerely,



A. Lowell Snow





Goldshield™

AP Goldshield LLC

9570 Pan American Dr.
El Paso, Texas, 79927

915.858.0971 Texas P.

516.674.4085 NY P

December 7, 2009

Ms. Maureen T. Sherrill]
Document Processing Desk COADR)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
1 Potomac Yard
Room SF 4900
277 South Crystal Drive
Arlington VA 22202

Re: Representative

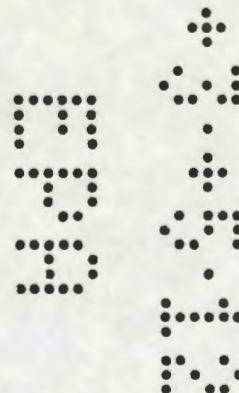
Dear Ms. Sherrill

This letter authorizes A. Lowell Snow 6981 Scenic Pointe Place Manassas VA 20112 to act as AP Goldshield LLC's representative in all registration matters. This authorization shall remain in effect until such time as AP Goldshield LLC notifies EPA, in writing, of cancellation.

Should you have any questions, please call.

Sincerely,

Ted Shlisky
COO





United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 85556-2	2. EPA Product Manager Velma Noble	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Goldshield 75	PM# 31	
5. Name and Address of Applicant (Include ZIP Code) APGoldshield 9570 Pan American Drive 9570 El Paso, TX 79927 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

To master label add 32 fluid oz to size; add as applications "equipment parts, machines, and surfaces (non food contact)" add Textiles, woven and non woven made from inert materials such as polypropylene, textured and spun bond Kevlar, polystyrene, or polyester, polyester resin treated and polyester/spandex or nylon/spandex

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name A. Lowell Snow		Title Agent for AP Goldshield	
		Telephone No. (Include Area Code) 85556-2	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			
2. Signature 		3. Title Agent for AP Goldshield	
4. Typed Name A. Lowell Snow		5. Date Jan 12, 2012	
		6. Date Application Received (Stamped)	

Material Sent for Data Extraction

Reg # 85556-2

Description: _____

☒ Material(s) Sent to Data Extraction Contractors:

☐ New Stamped Label Dated _____

☒ Notification Dated _____

☐ New CSF(s) Dated _____

☐ Other: _____

☒ Decision #: 462111

☐ Other Action/Comments: _____

Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer: E. DiQuenz

Phone: 347-0199 Division: AD

Date: _____

Created February 3, 2011

A.Lowell Snow
Consulting Agent for
AP Goldshield LLC
6981 Scenic Pointe Place
Manassas, VA 20112

APR - 5 2012

SUBJECT: Goldshield 75
EPA Registration Number: 85556-2
Application Date: January 12, 2012
Receipt Date: March 5, 2012

Dear Mr. Snow:

This letter acknowledges receipt of the notification identified above submitted under the provisions of section 3 (c) 9 of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended and PR Notice 98-10 and 40 CFR 152.46.

- Addition of alternate brand name "Veterans Shield 75" per PR Notice 98-10.

Based on a review of the submitted information, this notification is acceptable. Your proposed change will be made part of the record for this file.

General Comments

Should you have any questions concerning this letter, please contact Emilia Oiguenblik at (703) 347-0199 or Velma Noble at (703) 308-6233.

Sincerely,



Velma Noble
Product Manager (31)
Regulatory Management Branch I
Antimicrobials Division (7510P)

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

**A. Lowell Snow
Consultant**

**6981 SCENIC POINTE PLACE
MANASSAS, VIRGINIA 20112**

**PHONE: 703-791-7955
FAX: 703-791-0370
Mobile: 703-915-8866**

E-MAIL: ALSNOW@COMCAST.NET

January 12, 2012

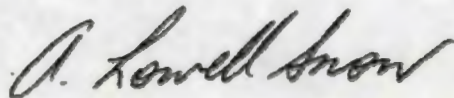
Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Attn: Velma Noble PM 31

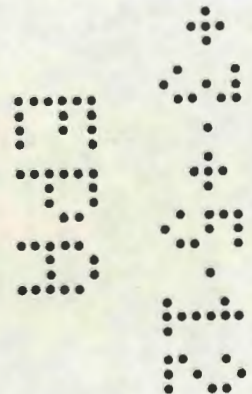
Attached are Form 8570-1 and an Authorization Letter for the author. AP Goldshield has EPA
Reg. No. 85556-2 and is by Notification is identifying an alternate brand name.

Please contact me if any further information is needed for your review.

Sincerely,



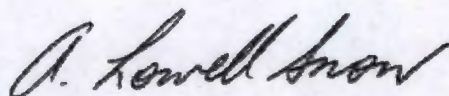
A. Lowell Snow



CERTIFICATION STATEMENT FOR 8556-2 Submission

"Notification of label change per PR Notice 1998-10. This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156. Update to Storage and Disposal section only. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with the requirements of 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA."

Signature

A handwritten signature in cursive script that reads "A. Lowell Snow".

4/3/2012

Date



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 85556-2	2. EPA Product Manager Velma Noble	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Goldshield 75	PM# 31	
5. Name and Address of Applicant (Include ZIP Code) AP Goldshield LLC 9570 Pan American Dr. El Paso Texas 79927 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

In accordance with PR Notice 98-10 Section II A, please add an "alternate" brand name "Veterans Shield 75" to the label. The "primary" brand name Goldshield 75 remains in effect.

Section - III

1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container	5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name A. Lowell Snow		Title Agent for AP Goldshield	
		Telephone No. (Include Area Code) 703-791-7955	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Agent for AP Goldshield	
4. Typed Name A. Lowell Snow		5. Date Jan 12, 2012	



Goldshield™

AP Goldshield LLC

9570 Pan American Dr.
El Paso, Texas, 79927

915.858.0971 Texas P.

516.674.4085 NY P

December 7, 2009

Ms. Maureen T. Sherrill]
Document Processing Desk COADR)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
1 Potomac Yard
Room SF 4900
277 South Crystal Drive
Arlington VA 22202

Re: Representative

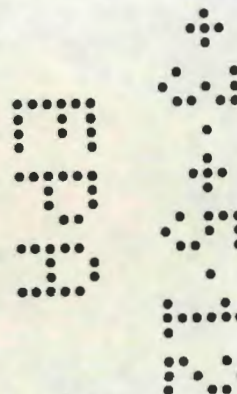
Dear Ms. Sherrill

This letter authorizes A. Lowell Snow 6981 Scenic Pointe Place Manassas VA 20112 to act as AP Goldshield LLC's representative in all registration matters. This authorization shall remain in effect until such time as AP Goldshield LLC notifies EPA, in writing, of cancellation.

Should you have any questions, please call.

Sincerely,

Ted Shlisky
COO



JUN - 8 2010

Mr. A Lowell Snow
 Consulting Agent for
 AP Goldshield LLC
 6981 Scenic Pointe Place
 Manassas, Virginia 20112

Subject: **Goldshield 75**
 EPA Registration Number 85556-2
 Application Dated January 5, 2010
 EPA Received Date January 15, 2010

Dear Mr. Snow:

The following amendment submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable.

Proposed Amendment:

- Submitted a Confidential Statement of Formula (CSF), for the basic formulation for the non-integrated end use product

Product Chemistry:

- The CSF, dated 01/05/10, for the basic formulation is used as reference.
- The CSF, dated 04/28/10, for the basic formulation is revised and accepted.
- The CSF and the label have the same nominal.
- All certified limits meet the EPA standard certified limits.
- You indicated that this amendment is a variation in the basic formulation, by

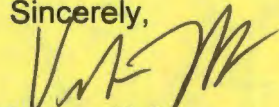
adding a new supplier for the active ingredients (AI). This proposed amendment will allow the customization of your product needs.							
SYMBOL							
SURNAME							
DATE							

6. The additional supplier for the active ingredient (AI), has been added to the agency database.
7. The label, dated 06/04/08, is used as reference.

General Comments:

Should you have any questions or comments concerning this letter, please contact Drusilla Copeland at (703) 308-6224 or Velma Noble at (703) 308-6233.

Sincerely,



Velma Noble
Product Manager (31)
Regulatory Management Branch I
Antimicrobials Division (7510P)

Enclosure: Product Chemistry review approved dated 4/28/10



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION,
PESTICIDES AND
TOXIC
SUBSTANCES

April 28, 2010

DP BARCODE: D375828

MRID: N/A

SUBJECT: **Goldshield 75**

REG. NO. OR FILE SYMBOL: 85556-2

DOCUMENT TYPE: Product Chemistry Review

Manufacturing-use ☐ OR End-use Product ☒

INGREDIENTS (PC Codes) 3-(trihydroxysilyl) propyl dimethyl octadecyl ammonium chloride (107403)

CAS Number 199111-50-7

TEST LAB: N/A

SUBMITTER: A P Goldshield

GUIDELINE: N/A

COMMODITIES: Formulation

REVIEWER: Salvador Rodríguez

ORGANIZATION: AD

APPROVER: Karen P. Hicks APROVED DATE: 05/04/10



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

PESTICIDES AND
TOXIC SUBSTANCES

April 28, 2010

MEMORANDUM

Subject: Product Chemistry Review for EPA Reg # 85556-2

From: Salvador Rodríguez, Chemist
Product Science Branch, CT Team
Antimicrobials Division (7510P)

Thru: Karen P. Hicks, CT Team Leader
Product Science Branch
Antimicrobials Division (7510P)

To: Drusilla Copeland/ Velma Noble
PM Team 31
Antimicrobials Division (7510P)

APPLICANT: A P Goldshield LLC.

Action code: 362

Due date: 06/13/10

Product Formulation
Active Ingredient(s)

% by wt

3-(trihydroxysilyl) propyl dimethyl octadecyl ammonium chloride0.75

BACKGROUND:

The registrant, A P Goldshield., has submitted a Confidential Statement of Formula (CSF) for the basic formulation for the non-integrated end-use product, **Goldshield 75**. The registrant is adding an alternate supplier for the active ingredient (AI). The Product Chemistry Reviewer has received the following documents:

- Confidential Statements of Formula (CSFs), dated 01/05/10, 06/02/08, and 04/27/10, for the basic formulations.
- A cover letter, dated 01/05/10.
- Application for pesticide amendment, dated 01/05/10.
- Fee of service, dated 03/15/10.
- Data matrix of The Technical Analysis of Formulation, previously accepted by EPA on 01/24/08.

FINDINGS:

1. The CSFs, dated 06/02/08, and dated 01/05/10 for the basic formulation are used as reference.
2. The CSF, dated 04/27/10, for the basic formulation is revised.
3. The CSF and the label have the same nominal.
4. All certified limits meet the EPA standard certified limits.
5. The registrant indicated that this amendment is a variation in the basic formulation, by adding a new supplier for the active ingredient (AI). This proposed amendment will allow the customization of their product needs.
6. The additional supplier for the active ingredient (AI), has been added to the agency database.
7. The label, dated 06/04/08, is used as reference.

CONCLUSIONS:

The CSF, dated 04/27/10, for the basic formulation is acceptable. The proposed technical amendment is acceptable. The justification for this amendment is acceptable. The technical amendment has been previously approved on 06/02/08.

DATA PACKAGE BEAN SHEET

Date: 25-Mar-2010

Page 1 of 1

Decision #: 430827

DP #: (375828)

NON PRIA

Parent DP #:

Submission #: 869411

*** Registration Information ***

Registration: 85556-2 - GOLDSHIELD 75

Company: 85556 - AP GOLDSHIELD LLC

Risk Manager: RM 31 - Velma Noble - (703) 308-6233 Room# PY1 S-8855

Risk Manager Reviewer: Drusilla Copeland DCOPELAN

Sent Date: _____

Calculated Due Date: 13-Jun-2010

Edited Due Date: _____

Type of Registration: Product Registration - Section 3

Action Desc: (362) FORMULA CHANGE; TECHNICAL;

Ingredients: 107401, 1-Octadecanaminium, N,N-dimethyl-N-(3-(trimethoxysilyl)propyl)-, chloride(.75%)

*** Data Package Information ***

Expedite: ☐ Yes ☒ No

Date Sent: 25-Mar-2010

Due Back: _____

DP Ingredient: 107401, 1-Octadecanaminium, N,N-dimethyl-N-(3-(trimethoxysilyl)propyl)-, chloride

DP Title: _____

CSF Included: ☐ Yes ☒ No

Label Included: ☐ Yes ☒ No

Parent DP #: _____

Assigned To

Date In

Date Out

Organization: AD / PSB

3/24/10

Last Possible Science Due Date: 29-Apr-2010

Team Name: CTT

3/24/10

05/04/10

Science Due Date: 5/11/10

Reviewer Name: Salvador

3/31/10

04/28/10

Sub Data Package Due Date: 5/25/10

Contractor Name: _____

04/05/10

*** Studies Sent for Review ***

No Studies

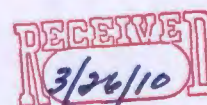
*** Additional Data Package for this Decision ***

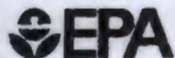
No Additional Data Packages

*** Data Package Instructions ***

Registrant has submitted CSF to be reviewed.

Please pull jacket + label





United States

Environmental Protection Agency

Washington, DC 20480

☐
☒
☐Registration
Amendment
Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number AP Goldshield / 85556-1 & 8556-2	2. EPA Product Manager Velma Noble	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) AP Goldshield / Goldshield 5 & Goldshield 75	PM# 31	
5. Name and Address of Applicant (Include ZIP Code) AP GoldShield 9570 Pan American Drive El Paso, TX 79927 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 85556-1 & 85556-2 Product Name Goldshield 5 & Goldshield 75	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

as additional supply for active

Section - III

1. Material This Product Will Be Packaged In:		2. Type of Container	
Child-Resistant Packaging <input checked="" type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 8,16.22.32.64 0	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product
6. Manner in Which Label is Affixed to Product adhesive <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name A. Lowell Snow	Title Agent for AP Goldshield	Telephone No. (Include Area Code) 703-791-7955
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Agent for AP Goldshield	
4. Typed Name A. Lowell Snow	5. Date 1/5/2010	

**A. Lowell Snow
Consultant**

**6981 SCENIC POINTE PLACE
MANASSAS, VIRGINIA 20112**

**PHONE: 703-791-7955
FAX: 703-791-0370
Mobile: 703-915-8866**

E-MAIL: ALSNOW@COMCAST.NET

January 5, 2010

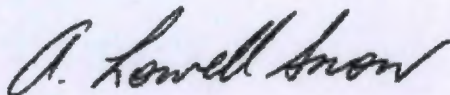
Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Attn: Velma Noble PM 31

Attached are Form 8570-1, 8570-4 (2 pages) and an Authorization Letter for the author. AP Goldshield has EPA Reg. Nos. 85556-1 and 85556-2 for Goldshield 5 and Goldshield 75 respectively. The attached seeks to add an alternate supplier, [REDACTED] to the existing CSF for the Active Ingredient.

Please contact me if any further information is needed for your review.

Sincerely,



A. Lowell Snow



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

January 5, 2010

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

A. LOWELL SNOW
A. LOWELL SNOW CONSULTING, AGENT FOR
AP GOLDSHIELD LLC
6981 SCENIC POINTE PLACE
MANASSAS, VA 20112

Dear Registrant:

Your request for a change in your Official EPA Company Name and Address record
has been completed. For your confirmation the Official EPA Company Name and Address record
EPA Company Number: 85556 is listed below.

A. LOWELL SNOW
AP GOLDSHIELD LLC
9570 PAN AMERICAN DRIVE
EL PASO, TX 79927

Agent Address:

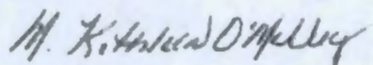
A. LOWELL SNOW
A. LOWELL SNOW CONSULTING, AGENT FOR
AP GOLDSHIELD LLC
6981 SCENIC POINTE PLACE
MANASSAS, VA 20112

Any future changes in company name and/or address or changes in
designation/withdrawal of authorized agent should be directed to the following address. It can
also be faxed to (703) 305-7670.

Document Processing Desk (COADR)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

If you have any questions, please call me at (703) 305-5411.

Sincerely,

A handwritten signature in dark ink, appearing to read "M. Kathleen O'Malley". The signature is written in a cursive, flowing style.

M. Kathleen O'Malley
Program Analyst
Office of Pesticide Programs



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

March 16, 2010

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

A. LOWELL SNOW
A. LOWELL SNOW CONSULTING
AP GOLDSHIELD LLC
6981 SCENIC POINTE PLACE
MANASSAS, VA 20112-

PRODUCT NAME: GOLDSHIELD 75
COMPANY NAME: AP GOLDSHIELD LLC
OPP IDENTIFICATION NUMBER:
EPA FILE SYMBOL: 85556-2
EPA RECEIPT DATE: 03/15/10

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Antimicrobials Division, Risk Management Team 31, at (703) 308-6233.

Sincerely,

P. B. Moore

Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

September 2, 2009

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MR. MURRY ZBOROWSKI
AP GOLDSHIELD LLC
9570 PAN AMERICAN DRIVE
EL PASO, TX 79927

Dear Mr. Zborowski:

Subject: Transfer of Pesticide Registrations and Data From Company Number 83075 to Company Number 85556

Pursuant to your request in your letter and transfer agreement of July 16, 2009, we have approved the transfer of the following registrations from **NBS TECHNOLOGY, LLC**, company number **83075** to **AP GOLDSHIELD LLC**, company number **85556**.

The effective date of these changes is the date of this letter.

<u>Registered Products</u>	<u>Old EPA Reg. No.</u>	<u>New EPA Reg. No.</u>
GOLD SHIELD 5	83075-1	85556-1
GOLDSHIELD 75	83075-2	85556-2

You should indicate the new company designation, new EPA Registration Number and new Establishment Number (if it has changed) on the labeling at the next printing which should occur no later than 18 months after the effective date of this transfer. After 18 months, any product released for shipment must bear the new Registration Number and Establishment Number. If you intend to use the labels which currently appear on the transferor's product after the effective date of the transfer, but within the 18 month grace period, you must maintain complete and accurate records which identify by batch number, lot number, or other suitable description the quantities of such product bearing the transferor's label. Each container or package bearing the transferor's label which is released after the effective date of product registration transfer, must be clearly and accurately marked with the batch number, lot number or other descriptive designation used to identify the product in your records.

Supplemental distribution agreements of registered products do not transfer with the Section 3 registration. It is your responsibility as the registrant to notify any and all supplemental distributors of the transferred product(s) of this transfer agreement. If you wish to enter into supplemental distribution agreements of your product(s) under this new registration, the form "Notice of Supplemental Distribution of a Registered Pesticide Product," EPA Form 8570-5,

must be submitted to the Agency for each supplemental distributorship.

You are required to contact your local EPA Regional Office to determine what effect this transfer of pesticide registrations has on the pesticide production establishment registration.

It will not be necessary to submit labeling for review if the only changes are in the company designation and the EPA Registration Number. Other changes in the product and/or labeling may require EPA review and approval prior to distribution or sale of the product containing the new registration number. In any correspondence on these products always refer to the U.S. EPA Registration Number listed above.

The transferred registration will have the same status under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, 7 USC 136 et seq., as it had prior to the approval of this transfer.

When registrations are transferred from one company to a second company, all restrictions, data requirements, conditions (suspensions), and deadlines existing on the registrations are transferred with the registrations. The new company is responsible for adhering to or complying with all such restrictions, etc. on the acquired products.

In regard to deadlines, the transferee company is responsible for submitting all required data according to the schedules already established for the acquired products. Failure to do so will result in the issuance of a Notice of Intent to Suspend. Requests from transferee companies for additional time to submit, because they acquired the registration(s) after the 3(c)(2)(B) request was issued will not be granted. If a transferee company has other valid reasons for delays in the testing which were clearly outside of their control, then such requests for time extensions will be considered in accordance with the established procedures. Transfers occurring while a 3(c)(2)(B) request is being issued or during the 90-day response time are subject to the same conditions expressed above.

Registration is in no way to be construed as an endorsement or approval of these products by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with FIFRA.

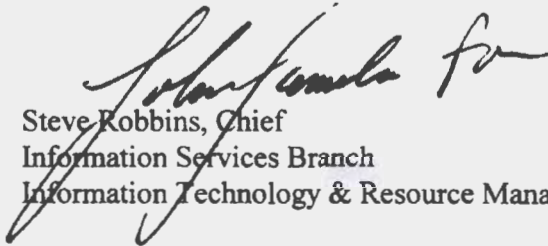
Furthermore, the transfer of the subject registrations is approved under the condition that the annual maintenance fee obligation has been fully satisfied. The marginal maintenance fee is determined based solely on the total number of active section 3 and section 24(c) registrations held by the transferor. If the annual maintenance fee has not been fully satisfied, the transferee and transferor will be notified to comply within a specified time period or the affected registrations may be canceled.

The Agency acknowledges it has received a request for data transfer dated July 16, 2009 to transfer data ownership from the transferor to the transferee. The data transfer is effective the date of this letter. After this date **AP GOLDSHIELD LLC** will be considered the data owner. This action will not automatically reflect on the Data Submitters List. If you want to be added to the Data Submitters List, you must submit a request to:

Document Processing Desk (DSL)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

By copy of this letter we are informing the transferor of these changes. If you have any questions about this transfer approval please contact Louis Vaughn at (703) 308-8114.

Sincerely,


Steve Robbins, Chief
Information Services Branch
Information Technology & Resource Management Div. (7504P)

cc: TED SHLISKY and THOMAS HIGGINS
NBS TECHNOLOGY, LLC
157 SKUNKS MISERY ROAD, PO Box 428
LOCUST VALLEY, NY 11560-

RE: L_83075_RAD_85556_09_02_2009.pdf



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs
Antimicrobials Division (7510P)
1200 Pennsylvania Avenue NW
Washington, D.C. 20460

EPA REG.

Number:

83075-2

Date of

Issuance:

JUN - 4 2008

Term of Issuance:

Conditional

Name of Pesticide Product:

Goldshield 75

NOTICE OF PESTICIDE:

 x Registration
 Reregistration

(under FIFRA, as amended)

Name and Address of Registrant (include ZIP Code):

NBS Technology, LLC
P.O. Box 428
157 Skunks Misery Rd.
Locust Valley, NY 11560

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec 3(c)(7)(a) provided that you:

1. Submit and/or cite all data required for registration of your product under FIFRA sec. 3(c)(5) when the Agency requires all registrants of similar products to submit such data; and submit acceptable responses required for re-registration of your product under FIFRA section 4.
2. Make the labeling change listed below before you release the product for shipment:

Revise the EPA Registration Number to read, "EPA Reg. No. 83075-2".

Signature of Approving Official:

Velma Noble

Velma Noble

Product Manager Team-31

Date:

JUN - 4 2008

Regulatory Management Branch I

CONCURRENCES

SYMBOL

Antimicrobials Division (7510P)

SURNAME

EPA Form 8570-6

DATE

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Page 2

EPA Reg. No. 83075-2

3. Goldshield 75 has been classified at Tox IV, based on the Toxicity Data used to support this product. A Signal Word, First Aid Statements, and Precautionary Language are not required for products in this category. Delete the Signal Word, First Aid Statements, and Precautionary Language from pages one and two.

4. Add the following statement to the beginning of the Directions for Use section on page three. *"Apply by brushing, dipping, padding, soaking, spraying, fogging, or by foam finish techniques."*

5. Revise the directions for use as a concrete additive by indicating the correct rate. Revise to indicate that **40** fluid ounces should be added per cubic foot of concrete.

6. Delete the section on page four which begins as follows: "Goldshield 75 can be used in paints and coatings as an in can preservative for protection of paint film...and blend and copolymers thereof." Delete this entire section as you have not included directions for this use.

7. Since this is a ready to use product, the following corrections are required on page five. In the pump spray application section revise to read: "...treats approximately 200 square feet *per gallon*. When treating coarser substrates..." In the commercial spray section revise in the same manner: "...treats approximately 200 square feet *per gallon*. When treating coarser substrates..."

8. Since this is a ready to use product, the column with dilution rate information on pages seven through ten is unnecessary and confusing. Delete this entire column on pages seven through ten.

9. Since this is a ready to use product, the following corrections are required on page eight in the carpet treatment section. Revise to state: "...*add the Goldshield 75 solution directly to the cleaning tank...*" and "...treats approximately 200 square feet *per gallon*. When treating coarser..."

10. Since this is a ready to use product, the following corrections are required on page ten in the roofing materials section. Revise to state: "...After applying the Goldshield 75 let stand until dry..." and "...*treats approximately 200 square feet of roofing or wall per gallon*. If necessary..."

11. Revise page twelve by deleting the claim at the bottom of the page beginning: "Note: Any claims for paint use must be for the preservation of the paint in the can..." Your product does not include directions for this use, thus this claim must be deleted.

CONCURRENCES

SYMBOL								
SURNAME								
DATE								

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Page 3

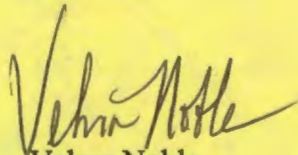
EPA Reg. No. 83075-2

12. Upon completion, submit a one year Storage Stability and Corrosion Characteristics Study to the Agency for review.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records. Submit one (1) copy of your final printed labeling prior to release of this product for shipment. If you have any questions concerning this letter, please contact Tracy Lantz at (703) 308-6415.

Sincerely,



Velma Noble
Product Manager 31
Regulatory Branch I
Antimicrobials Division (7510P)

Enclosure: (Stamped Label)
7510P:T. Lantz:6/2/08:83075-2

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

NBST Goldshield™



Goldshield 75™

MICROBIOSTATIC AGENT
A Silicone Quaternary Ammonium Salt

ACCEPTED
with COMMENTS
in EPA Letter Dated:

JUN - 4 2008

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. **83075-2**

Active Ingredient:	3-(Trihydroxysilyl)propyldimethyloctadecyl ammonium chloride.....	0.75%
Other Ingredients:	99.25%
TOTAL INGREDIENTS:	100.0%

KEEP OUT OF REACH OF CHILDREN

EPA Reg. No. 83075-2

~~WARNING~~

EPA EST. 82816-SC-001

NET CONTENTS: 2, 4, 8, 16, 20, 22, or 36 fluid oz.; 1, 5, 55, 150, or 275 gal.

Lot No. _____

~~FIRST AID~~

Have the product container or label with you when calling the poison control center or doctor, or going for treatment.

IF IN EYES:

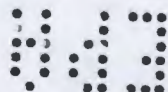
- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
- Call poison control center or doctor for treatment advice.

IF INHALED:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.
- Call a poison control center or doctor for further treatment advice.

IF ON SKIN:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.



- Call a poison control center or doctor for treatment advice.

IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

A microbiostatic agent is an agent that inhibits the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae. This product does not protect users or others against food-borne or disease-causing bacteria.

~~PRECAUTIONARY STATEMENTS~~

~~HAZARDS TO HUMANS AND DOMESTIC ANIMALS~~

~~WARNING:~~ Causes substantial but temporary eye injury. Harmful if absorbed through skin or inhaled. Do not get in eyes. Avoid contact with skin and avoid breathing vapor. Wear protective eyewear (goggles or face shield). Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

Commercial and industrial uses: This pesticide is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

De-activation may be required during clean up if a spill occurs. De-activation of *GOLDSHIELD 75™* can be achieved by the addition of anionic surfactant (such as soap, sulfonates, sulfates) in quantity equivalent to that of *GOLDSHIELD 75™*.

Homeowner use: This pesticide is toxic to fish. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of pesticide.

DIRECTIONS FOR USE

Approved commercial and Industrial Applications

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Wear protective eyewear (goggles or face shield) and gloves when using this product. Dry treated areas and articles such as clothing before use. Remove children and pets from treated area until completely dry.

Dry substrates at temperatures from ambient to a maximum of 160° C (320° F) to effect complete condensation of silanol groups and to remove water, solvents and/or traces of methanol from hydrolysis. Optimum application and drying conditions, such as time and temperature, should be determined for each application before use. If necessary, reapply *GOLDSHIELD 75™* every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.

GOLDSHIELD 75™ when used as a concrete additive is added directly during concrete preparation. Use \times fluid ounces *GOLDSHIELD 75™* per cubic feet of concrete. Add to water before addition of concrete. Addition of *GOLDSHIELD 75™* reduces deterioration of sewer pipes and manholes by inhibiting microbiologically induced corrosion.

Approved commercial and industrial applications

The active ingredient in *GOLDSHIELD 75™* is effective against odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew) and algae as a static agent. *GOLDSHIELD 75™* can be used as a final bacteriostatic finish on the following items to impart bacteriostatic/fungistatic (mold and mildew) activity.

- Air filters for furnaces, air-conditioners, air purification devices, automobiles, recirculating air handling systems
- Air filters/materials
- Aquarium filter material
- Bed sheets, blankets, and bedspreads
- Buffer pads (abrasive and polishing)
- Carpets and draperies
- Cellulose sponges
- Concrete additive for sewer pipes, manholes and concrete sewer structures; not to be used in treatment of storm drains
- Concrete additive for repair and renewal of sewer pipes and manholes and concrete sewer structures; not to be used in treatment of storm drains
- Exterior walls (such as stone, concrete, brick)
- Fiberfill for upholstery, sleeping bags, apparel, where the fiber is cotton, natural down, nylon, polyester, rayon, or wool
- Fiberglass ductboard
- Fire hose fabric
- Humidifier belts
- Mattress pads and ticking
- Mens underwear and outerwear
- Non-woven disposable diapers
- Non-woven polyester

PAGE 4 - MASTER LABEL FOR *GOLDSHIELD 75™*

- Outerwear apparel (jackets, sweaters, sweatshirts, coats, raincoats, overcoats, jerseys, ponchos)
- *GOLDSHIELD 75™* can be used in paints and coatings as an in-can preservative for protection of paint film and coating film. Types of paints and coatings include : latex indoor/outdoor paints and stains, wood-stains, architectural paints, lacquer and maintenance coatings, films, laminates and finishes including alkyd, urethane, enamel, epoxy, siloxane, amino resins, textile coatings, extrusion coatings, architectural coatings and overlays, anti-corrosion coatings, fire-resistant coatings, aliphatic coatings, vinyl ester and polyester coatings, gel coatings, amino resins, resins used as additive mixes for cement, epoxy laminating resins, and blends and copolymers thereof;
- Polyurethane and cellulose foam for household, industrial, and institutional sponges and mops
- Polyurethane and polyethylene foam, when covered
- Polyurethane foam for packaging and cushioning in non-food contact applications
- Polyurethane foam used as a growth medium for non-food crops and plants
- Pre-moistened towelettes and tissue wipes (these do not impart pesticidal properties)
- Roofing materials - defined as shingles, roofing granules, wood shakes, felt, stone and synthetic overcoats
- Sand bags, tents, tarpaulins, sails, and ropes
- Athletic and casual shoes
- Shoe insoles
- Shower curtains
- Socks comprised of nylon, nylon/orlon, cotton/nylon, linen/Lycra, acrylic/polypropylene/nylon/Lycra, wool/silk/nylon/Lycra and wool/acrylic/nylon/Lycra
- Throw rugs
- Toweling made of 100 percent cotton, 100 percent polyester, and blends of the two fibers
- Toilet tank and seat covers
- Umbrellas
- Upholstery made of acetates, acrylics, cotton, fiberglass, nylon, polyester, polyethylene, polyolefins, polypropylene, rayon, spandex, vinyl, wool
- Vacuum cleaner bags and filters
- Vinyl paper-wallpaper for non-food contact surfaces
- Disposable wiping cloths that can be used for multiple purposes such as dusting or washing furniture, cars, walls, windows, floors, appliances, dishes, counter tops; the wiping cloths do not impart pesticide properties
- Women's hosiery
- Women's intimate apparel

DIRECTIONS FOR USE

**Approved commercial applications used in homes, offices, automobiles and institutions
e.g., schools, hospitals, daycare centers, churches, correctional facilities**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Wear protective eyewear (goggles or face shield) and gloves when using this product. Dry treated areas and articles such as clothing before use. Remove children and pets from treated area until completely dry. Clean surfaces prior to application.

For Pump Spray Application: Using pump sprayer, spray entire area 4"- 6"s from the surface making sure the surface is completely covered. Apply and then let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test for staining and color-fastness of fabrics and carpets by treating and drying a small, concealed area prior to application. *GOLDSHIELD 75™* treats approximately 200 square feet per diluted gallon of water. When treating coarser substrates, more *GOLDSHIELD 75™* may be required due to absorption. A fan may be used to assist in drying carpeting.

For Commercial Spray Application: For commercial application equipment (i.e. carpet/upholstery steamers, rotary jet extraction cleaners, pressure sprayers) Apply and then let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test for staining and color-fastness of fabrics and carpets by treating and drying a small, concealed area prior to application. *GOLDSHIELD 75™* treats approximately 200 square feet per gallon of water. When treating coarser substrates, more *GOLDSHIELD 75™* may be required due to absorption. Dry carpet areas and surfaces before re-entry and dry articles before use. A fan may be used to assist in drying carpeting.

For Dipping/Soaking Application: Use appropriate sized wash basin or tub for dipping/soaking the item you are treating. Use enough *GOLDSHIELD 75™* solution to completely submerge item. Completely submerge item in solution for 3 minutes. Remove item and dry. Test for staining and color-fastness of fabrics by treating and drying a small, concealed area prior to application. Do not reuse solution after dipping/soaking.

The substrate can be dried at room temperatures or at temperatures to a maximum of 160° C (320° F), for example in a clothes dryer. Remove excess liquid before attempting to dry in a clothes dryer. If necessary, reapply *GOLDSHIELD 75™* every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.

**Approved commercial applications in homes, offices, automobiles and institutions
e.g., schools, hospitals, day care centers, banks, churches, correctional facilities**

The active ingredient in *GOLDSHIELD 75™* is effective against odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew) and algae as a static agent.

GOLDSHIELD 75™ can be used as a final bacteriostatic finish on the following items to impart bacteriostatic/fungistatic (mold and mildew) activity.

PAGE 6 - MASTER LABEL FOR *GOLDSHIELD 75™*

- Air filters for furnaces, air-conditioners, air purification devices, automobiles, recirculating air handling systems
- Air filters/materials
- Aquarium filter material
- Bed sheets, blankets, and bedspreads
- Buffer pads (abrasive and polishing)
- Carpets and draperies
- Cellulose sponges
- Exterior walls (such as stone, concrete, brick)
- Fiberfill for upholstery, sleeping bags, apparel, where the fiber is cotton, natural down, nylon, polyester, rayon, or wool
- Fiberglass ductboard
- Fire hose fabric
- Humidifier belts
- Mattress pads and ticking
- Mens underwear and outerwear
- Non-woven polyester
- Outerwear apparel (jackets, sweaters, sweatshirts, coats, raincoats, overcoats, jerseys, ponchos)
- Polyurethane and cellulose foam for household, industrial, and institutional sponges and mops
- Polyurethane and polyethylene foam, when covered
- Polyurethane foam for packaging and cushioning in non-food contact applications
- Polyurethane foam used as a growth medium for non-food crops and plants
- Roofing materials - defined as shingles, roofing granules, wood shakes, felt, stone and synthetic overcoats
- Sand bags, tents, tarpaulins, sails, and ropes
- Athletic and casual shoes
- Shoe insoles
- Shower curtains
- Socks comprised of nylon, nylon/orlon, cotton/nylon, linen/Lycra, acrylic/polypropylene/nylon/Lycra, wool/silk/nylon/Lycra and wool/acrylic/nylon/Lycra
- Throw rugs
- Toweling made of 100 percent cotton, 100 percent polyester, and blends of the two fibers
- Toilet tank and seat covers
- Umbrellas
- Upholstery made of acetates, acrylics, cotton, fiberglass, nylon, polyester, polyethylene, polyolefins, polypropylene, rayon, spandex, vinyl, wool
- Vacuum cleaner bags and filters
- Vinyl paper-wallpaper for non-food contact surfaces
- Disposable wiping cloths that can be used for multiple purposes such as dusting or washing furniture, cars, walls, windows, floors, appliances, dishes, counter tops; the wiping cloths do not impart pesticide properties
- Women's hosiery
- Women's intimate apparel

DIRECTIONS FOR USE

For homeowner applications

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Wear protective eyewear (goggles or face shield) and gloves when using this product. Dry treated areas and articles such as clothing before use. Remove children and pets from treated area until completely dry. Clean surfaces prior to application.

Approved homeowner uses

The active ingredient in *GOLDSHIELD 75™* is effective against odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew) and algae as a static agent. *GOLDSHIELD 75™* can be used as a final bacteriostatic finish on the following items to impart bacteriostatic/fungistatic (mold and mildew) activity.

	Pest controlled	Dilution Ratio	Method of Application
Bed-sheets, blankets, bedspreads, curtains, draperies (washable only), underwear, socks, intimate apparel, hosiery, throw rugs, toweling, toilet tank covers, shower curtains, shoe insoles, outerwear apparel (jackets, sweaters, sweatshirts, coats, raincoats, overcoats, jerseys, ponchos). <i>GOLDSHIELD 75™</i> can be applied to fabrics made of acetates, acrylics, cotton, fiberglass, linen, Lycra, nylon, orlon, polyester, polyethylene, polyolefins, polypropylene, rayon, silk, spandex, vinyl, and wool	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	1:10	<p>DIP/SOAK: Use appropriate sized wash basin or tub for dipping/soaking the item you are treating. Use enough <i>GOLDSHIELD 75™</i> solution to completely submerge item. Keep item in solution for 3 minutes. Remove item and wring excess liquid. *Drying may be attained by dripping dry or wringing excess liquid from treated item. For larger items (e.g., bedspreads, curtains, draperies), place in washing machine on spin cycle to aid in the removal of excess liquid. Test staining and color-fastness of fabric and carpets by treating and drying a small concealed area prior to application. Do not reuse solution after dipping/soaking. Dry treated articles before use. Substrates can be hang-dried at room temperature or at temperatures to a maximum of 160 °C (320 °F); (for example in a clothes dryer). If necessary, reapply <i>GOLDSHIELD 75™</i> every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.</p> <p>SPRAY: Clean surface prior to application. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4"-6" from the surface making sure the surface is completely covered. Let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting</p>

			occurs, wipe with moist cloth or sponge. Test staining and color-fastness of fabric by treating and drying a small concealed area prior to application. If necessary, reapply <i>GOLDSHIELD 75™</i> every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.
	Pest controlled	Dilution Ratio	Method of Application
Air filters and air filter material for <ul style="list-style-type: none"> • Furnaces, air conditioners • Air purification systems • Automobiles • Recirculating air handling systems • Vacuum cleaner filters • Aquariums 	Odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae		SPRAY: When treating filters, remove filter from the unit. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4"- 6" from the surface making sure the surface is completely covered. Apply and then let stand until dry. If necessary, reapply <i>GOLDSHIELD 75™</i> every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return.
	Pest controlled	Dilution Ratio	Method of Application
Carpeting	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)		SPRAY: Apply to clean carpet surface. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4"- 6" from the surface making sure the surface is completely covered. For rotary jet extraction cleaners and carpet steamers, add the <i>GOLDSHIELD 75™</i> solution directly to the cleaning tank, then operate the equipment in accordance with manufacturer's instructions. Apply and then let stand until dry. Test staining and color-fastness of carpets by treating and drying a small concealed area prior to application. <i>GOLDSHIELD 75™</i> treats approximately 200 square feet per gallon of solution. When treating coarser substrates (e.g., wool carpeting), more <i>GOLDSHIELD 75™</i> may be required due to absorption. Dry carpet areas and surfaces before re-entry. A fan may be used to assist in drying carpeting. Remove children and pets from treated area until completely dried. If necessary, reapply <i>GOLDSHIELD 75™</i> every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.

	Pest controlled	Dilution Rate	Method of Application
Mattress pad and mattress ticking and upholstery composed of acetates, acrylics, cotton, fiberglass, nylon, polyester, polyethylene, polyolefins, polypropylene, rayon, spandex, vinyl, wool; fiberfill to be used in upholstery, sleeping bags, apparel, where the fiber is cotton, natural down, nylon, rayon or wool	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)	1:10	SPRAY: Clean surfaces prior to application. Using a trigger pump sprayer spray the entire surface area 4"- 6" from the surface making sure the surface is completely covered. Apply and then let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test staining and color-fastness of fabric by treating and drying a small concealed area prior to application. When applying to mattress pads and ticking do not soak. Remove children and pets from treated area until completely dried. If necessary, reapply <i>GOLDSHIELD 75™</i> every three months or when odor, staining and discoloration due to bacteria, mold stains and mildew stains return.
	Pest controlled	Dilution Rate	Method of Application
Tents, tarpaulins, sails, ropes.	Odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae	1:10	<p>SPRAY: Clean surface prior to application. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4"-6" from the surface making sure the surface is completely covered. Let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. Test staining and color-fastness of fabric by treating and drying a small concealed area prior to application. If necessary, reapply <i>GOLDSHIELD 75™</i> every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return.</p> <p>DIP/SOAK: Use appropriate sized wash basin or tub for dipping/soaking the item you are treating. Use enough <i>GOLDSHIELD 75™</i> solution to completely submerge item.</p>

			Keep item in solution for three minutes. Remove item and wring excess liquid. Test staining and color-fastness of fabric by treating and drying a small concealed area prior to application. Do not reuse solution after dipping/soaking. Dry treated articles before use. Substrates can be hang-dried at room temperature or at temperatures to a maximum of 160 °C (320 °F); (for example in a clothes dryer). Remove excess liquid before attempting to dry in a clothes dryer. If necessary, reapply <i>GOLDSHIELD 75™</i> every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return.
	Pest controlled	Dilution Rate	Method of Application
Roofing materials (such as shingles, roofing granules, wood shakes, felt, stone, synthetic overcoats) Exterior walls (such as stone, concrete, brick)	Odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae		SPRAY: Make sure the roof or wall is clean prior to application. Using a pressure sprayer, spray the entire surface area 6"-12" from the surface making sure the surface is completely covered. After applying the dilution of <i>GOLDSHIELD 75™</i> let stand until dry. <i>GOLDSHIELD 75™</i> treats approximately 200 square feet of roofing or wall per gallon water . If necessary, reapply <i>GOLDSHIELD 75™</i> every three months or when odor, staining and discoloration due to bacteria, mold stains, mildew stains, and algae stains return.
	Pest controlled	Dilution Rate	Method of Application
Buffer pads (polishing and abrasive), Polyurethane and cellulose foam for household sponges and mops, vacuum cleaner bags, umbrellas, casual shoes, athletic shoes	Odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew)		SPRAY: Clean surface prior to application. Using a trigger pump sprayer or pressure sprayer, spray the entire surface area 4"-6" from the surface making sure the surface is completely covered. Let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. If necessary, reapply <i>GOLDSHIELD 75™</i> every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.
	Pest controlled	Dilution Rate	Method of Application
Tubs, glazed tiles, vanity tops, shower curtains, shower stalls (areas), sinks,	Odor causing bacteria,		SPRAY: Using a trigger pump sprayer, spray the entire surface area 4"- 6" from the surface making sure the surface

washable walls, wall paper for non-food contact, floors, window sills, cabinets, garbage cans, appliances, refrigerators (exterior), fiberglass, formica, glazed tiles, glazed porcelain, synthetic marble, plastic, vinyl	bacteria which cause staining and discoloration, and fungi (mold and mildew)	is completely covered. Let stand until dry or let stand 3 minutes and wipe dry with cloth or sponge. If spotting occurs, wipe with moist cloth or sponge. If necessary, reapply <i>GOLDSHIELD 75™</i> every three months or when odor, staining and discoloration due to bacteria, mold stains, and mildew stains return.
--	--	---

MOLD, MILDEW, ODOR PROTECTOR AND INHIBITOR *GOLDSHIELD 75™* is an antimicrobial agent effective against odor causing bacteria.

GOLDSHIELD 75™ is an antimicrobial agent effective against bacteria which cause staining and discoloration.

GOLDSHIELD 75™ is an antimicrobial agent effective against fungi (mold and mildew).

GOLDSHIELD 75™ is an antimicrobial agent effective against algae.

GOLDSHIELD 75™, an antimicrobial agent, controls the source of odors on surfaces in the home, in the bathroom, in the kitchen.

Bacteriostatic, fungistatic (mold and mildew), algaestatic.

GOLDSHIELD 75™ an antimicrobial agent, inhibits smelly odors caused by mold and mildew that can grow even in the cleanest of homes.

GOLDSHIELD 75™, an antimicrobial agent, inhibits the growth of odor causing bacteria.

Effective on hard non-porous washable bathroom and kitchen surfaces and fixtures around the home.

Effective on modern hard non-porous washable surfaces made of fiberglass, glazed porcelain, Formica®, stainless steel, synthetic marble.

Imparts microbiostatic properties.

Use on carpet and upholstery to inhibit odor causing bacteria, bacteria which cause staining and discoloration, and fungi (mold and mildew).

Unscented.

Use on carpet and upholstery to inhibit the growth of odor causing bacteria.

Use on carpet and upholstery to inhibit the growth of bacteria which cause staining and discoloration.

Use on carpet and upholstery to inhibit the growth of fungi (mold and mildew).

Use on carpet and upholstery to inhibit the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae.

Provides an invisible microbiostatic coating to inhibit the growth of odor causing bacteria.

Provides an invisible microbiostatic coating to inhibit the growth of bacteria which cause staining and discoloration.

Provides an invisible microbiostatic coating to inhibit the growth of fungi (mold and mildew).

Provides an invisible microbiostatic coating to inhibit the growth of algae.

Provides an invisible microbiostatic coating to inhibit the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae.

Prevents deterioration caused by bacteria and fungi (mold and mildew).
Inhibits deterioration caused by bacteria.
Resists development of microbial odors.
Resists development of stains and discoloration due to bacteria.
Resists development of stains due to fungi (mold and mildew).
Resists stains due to algae.
Resists development of microbial odors, stains and discoloration due to bacteria, fungi (mold and mildew), and algae.
Provides/creates an invisible barrier to inhibit the growth of odor causing bacteria.
Provides/creates an invisible barrier to inhibit the growth of bacteria which cause staining and discoloration.
Provides/creates an invisible barrier to inhibit the growth of fungi (mold and mildew).
Provides/creates an invisible barrier to inhibit the growth of algae.
Provides/creates an invisible barrier to inhibit the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae.
Provides/creates an invisible barrier to inhibit the growth of odor causing bacteria, bacteria which cause staining and discoloration, fungi (mold and mildew), and algae.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

Pesticide Storage: Store in original, tightly closed containers below 30°C (86°F) and above 0°C (32°F) in a secure area inaccessible to children and away from food or feed.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. **[For homeowner use the statement will read:** "Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site."]

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke. **[For homeowner use statement will read:** "Container Disposal: Securely wrap original container in several layers of newspaper and discard in trash."]

Note: Any claims for paint use must be for the preservative of the paint in the can. *GOLDSHIELD 75™* is to be used as a paint can preservative for paints to control the growth of odor causing bacteria, bacteria which causes staining and discoloration, fungi (mold and mildew) and algae.

PAGE 13 - MASTER LABEL FOR *GOLDSHIELD 75™*

FOR MORE INFORMATION CONCERNING THIS PRODUCT, PLEASE CONSULT THE MATERIAL SAFETY DATA SHEET (MSDS). THE MSDS CAN BE OBTAINED BY WRITING : NBS Technology, LLC PO Box 428, 157 Skunks Misery Rd, Locust Valley, NY 11560 or emailing: enbst@optonline.net

IMPORTANT: WARRANTY AND DISCLAIMER INFORMATION

NBS Technology, LLC warrants that the product conforms to its chemical description and is reasonably fit for the purposes stated in this bulletin when used in accordance with directions under normal conditions of use; but this warranty of fitness for a particular purpose does not extend to the use of this product contrary to bulletin instructions, or under abnormal conditions, or under conditions not reasonably foreseeable to the seller, and buyer assumes the risk of any such use.

NBS Technology, LLC SPECIFICALLY DISCLAIMS ANY OTHER EXPRESS OR IMPLIED WARRANTY, INCLUDING THE WARRANTY OF MERCHANTABILITY

83075-E

5/9/07
senior
Tracy agreed
A54

A54

presented @
ACTA
6/5/07

D378983
S809596

Issues:

Do not know action code

No CSF - mention of silane
quats + sodium hypochlorite
(cgl)

Cited 2 tox studies - asked for
dermal sensitization waiver
used cite all - but are they
identical to a registered product?
Do we need to do a bridging
review??

cited product chemistry from their registered
products? But they seem to indicate
that this is a dilution of registered
∴ this product would need it's own
product chemistry data

generic chemistry data? How are they addressing?

No label - AI's? Claims? Rate? Directions for
use? Is it really similar to something
in the market place? Like 70871-5?

5/23/07 rec'd rejected study - analyt. method
5/24/07 found label attached to
rejected study

Nomenclature of AI incorrect
on label

6/4/07 drafted 75 day letter for Velma

6/5/07 75 day letter to Velma

6/12/07 left message for Mr. Shlisky - 75 day letter
is dated 6/6/07

~~tentative~~ start:

5/22/07

9/12/07

~~tentative~~ due:

9/19/07

11/10/08

renegotiated to

5/10/08

renegotiated to (late reply
6/10/08 from N56)

9/21/07 full
fee not
paid

I think it
should be
an A54
and get an
incomplete (75 day)
letter up
front

120 days
review

print
label from
83075-1
to compare

12/18/07 rec'd
chemistry
back + tox
review

8/3/07 incomplete reply to
75 day letter at back

not paid
as of
6/4/07

not paid
6/12/07

not paid
8/2

not paid
8/14

4200
Pd.
9/12/07

6/20/07 Spoke w/ Theodore Shlisky.

He had not rec'd 75 day letter, I emailed
it to him @ mdvd+@aol.com

9/5/07 Chemistry + Tox for bridging sent for
review. Citing 70871-19
Partial fee has been paid - clock
will not start until full fee paid.

Compare label to 82077-4

9/26/07 spoke to Tom Higgins regarding payment of
\$3150. He said he sent in 9/10/07
to Pittsburgh, cleared his accounts 9/13/07.

12/18/07 received unacceptable chemistry review
received acceptable tox review

Dennis + Tracy called Tom Higgins to
discuss renegotiation

Also faxed both reviews to Tom H.

12/19/07 Dennis further discussed chemistry data w/
Tom Higgins

12/20/07 Chris Viango discussed chemistry deficiencies
w/ Tom H.

12/21/07 wrote less than 75 day letter - faxed to
Tom Higgins

1/15/08 have not received data - called + sent email
to Tom Higgins!

1/23/08 rec'd reply to chemistry deficiencies -
was not formatted as per 86-5 -
unacceptable - sent email to Tom Higgins -
(discussed w/ Chris who agreed on 86-5
issue). Will need to renegotiate again!

1/26/08 spoke w/ Teresa Downs. She worked w/ registrant
on 1/24/08 to get correct info. to Agency so
study could receive MRID. She has fast tracked
we should rec. in AD on Monday

4/15/08 Chris' acceptable chemistry review ~~attached~~ attached

Explore Registrations

Reg Number: 83075-E

Reg. Type: Product Registration - Section 3

Status: Under Review (01-May-2007)

Name: GOLDSHIELD 75

<View Registration Details>

(No New Receipts)

S.	Submission Type	OPP Rec'd Date	Resubmission	Description

...Decisions...

Data Requirements

D: Pending, 378983, 83075-E, A54, NEW PRODU

Decision Sequence: 378983

Action: A54 NEW PRODUCT;NON-FAST TRACK;FIFRA SEC. 2(M

Number: 83075-E Original Decision:

Name: GOLDSHIELD 75

Decision Status: PENDING (09-May-2007)

Organization Owner: AD / RMB1

Team Owner: RM 31

FFS Start Date 12-Sep-2007 Received by Risk Manager:

Due Date 10-Jan-2008 FFS Amt Expected: \$4,200

Negotiated Due Date: FFS Amt Refunded:

FFS Amt Received: \$4,200

Comments:

Fee for Service

{809596\~

This package includes the following

- New Registration
Amendment

✓ Studies? Fee Waiver?
volpay % Reduction: _____

for Division

- AD
BPPD
RD

Risk Mgr. 31

Receipt No.

S-

809596

EPA File Symbol/Reg. No.

83075-E

Pin-Punch Date:

5/1/2007

☐ This item is NOT subject to FFS action.

Action Code:

Requested:

N/A

Granted:

A54

Amount Due: \$ 4200

Parent/Child Decisions:

Reviewer: Lantz Date: 5/9/07

Remarks: No CSF, No label, needs immediate 75 day letter of deficiencies to address in 10 days or administratively withdraw in 75 days.

Explore Registrations				
Reg Number:	83075-E	Reg. Type:	Product Registration - Section 3	Status: Under Review (01-May-2007)
Name:	GOLDSHIELD 75			<View Registration Details>
(No New Receipts)				
S:	Submission Type	OPP Rec'd Date	Resubmission	Description
<div> <div> ...Decisions... <div> Data Requirements <div> D: Pending: 378983; 83075-E; A54; NEW PRODU <div> S: 809596 5/1/2007; New Registration; 830: </div> </div> </div> </div> </div>				

Decision Sequence: 378983

Action: A54 NEW PRODUCT; NON-FAST TRACK; FIFRA SEC. 2(MM)

Number: 83075-E

Original Decision:

Name: GOLDSHIELD 75

Decision Status: PENDING (09-May-2007)

Organization Owner: AD / RMB1

Team Owner: RM 31

Tentative Start Date: 22-May-2007

Received by Risk Manager:

Tentative Due Date: 19-Sep-2007

FFS Amt Expected: \$4,200

Negotiated Due Date:

FFS Amt Refunded:

FFS Amt Received: \$0

Comments:

No CSF

submitted

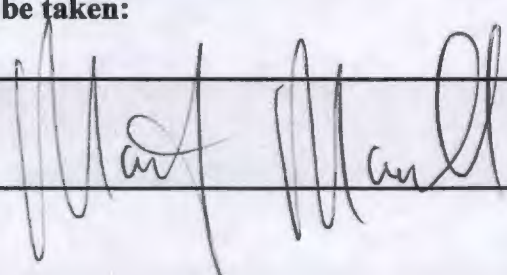
5/1/2007

Receipt for Section 3			
S:	809596	Resubmission:	<input type="radio"/> Yes <input checked="" type="radio"/> No
Regulatory Type:	Product Registration - Section 3	Fee For Service:	<input checked="" type="radio"/> Yes <input type="radio"/> No
Application Type:	New Registration	Billable:	<input checked="" type="radio"/> Yes <input type="radio"/> No
Company:	83075 NBS TECHNOLOGY, LLC		V
Risk Manager:	Antimicrobials Division, Risk Management Team 31		
Product #:	83075-E	Product Name:	GOLDSHIELD 75
Override#:			
Me Too Section3:	75497-5	Me Too Product Name:	BST PROTECTANT RTU 75
Application Date:	20-Apr-2007	OPP Rec'd Date:	01-May-2007
Front End Date:	01-May-2007	Risk Manager Send Date:	
FFS Due Date:		Negotiated Due Date:	
OPP Target Date:			
Fast Track:	<input type="checkbox"/>	New Ingredient:	<input type="checkbox"/>
Receipt Description:		New Ingredient Request Date: New Ingredient Received Date: Signature Date:	
APPLICATION FOR REGISTRATION OF NEW PRODUCT			
Form A:	<input type="checkbox"/>	Signature Date:	
Form B:	<input type="checkbox"/>	Signature Date:	

Print Letter
 Enter More Information
 Tracking

Receipt Content
 Study

**Recommendation of Division Directors
Negotiated Due Dates**

Decision#: D378983		Registration#: 83075-E		Petition #:	
Fee Category: A54			PRIA Decision Time Frame: 120 days		
Submitted by: Velma Noble/Tracy Lantz			Branch: RMBI		Date: 2/5/08
Company: NBS Technologies					
Original Due Date: 1/10/08			Proposed New Due Date: 6/10/08		
Previous Negotiated Due Dates: one 5/10/08					
Is the "Fix" in-house? Yes			If not, date "Fix" expected:		
Issue (describe in detail): Registrant did not submit the fix by the promised date of 1/9/08. Data did not arrive until 1/24/08.					
Summary of Deficiency Type(s): Not Submitted (N) Deficiencies (D) Product Chemistry: <u> D </u> Acute Tox: <u> </u> Efficacy: <u> </u> Labeling: <u> </u> Other (describe): <u> </u>					
Describe Interactions with Company (describe when contacted and company's response including response to previous negotiated due dates): Contacted registrant on 1/16/08 indicating that a second renegotiation may occur due to late reply by company. Called the registrant on 1/30/08 to discuss the need for an additional 30 days review time. Registrant agreed to 30 day extension via e-mail message.					
"75 Day" Letter sent? <u> X </u> 12/21/07 <u> </u> (Date sent) Yes <u> </u> No and reason for none?					
Rationale for Proposed Due Date: Asked for an additional 30 day review to allow adequate time for the regulatory review.					
Registrant notified that this is the last negotiation? <u> X </u> Yes <u> </u> Not Applicable 1 st Negotiation					
Approve: <u> ✓ </u>			Disapprove:		
If disapproved, action to be taken:					
OD or DOD Signature: 				Date: 2-8-08	



thigginsnbs@optonline.net
01/30/2008 03:56 PM

To Tracy Lantz/DC/USEPA/US@EPA
cc Velma Noble/DC/USEPA/US@EPA, MDVDT@aol.com
bcc

Subject Re: Fw: Extension 83075-E Update

I agree to the thirty day extension, which was [as I discussed by phone today] precipitated as a result of not having your chemist fully understand the chemistry of the technology and [REDACTED] our csf forms. To have submitted data until that was cleared up would have been a fools errand. I am also mindful of the holidays and vacation days that factored into our inability to meet the target date we had been shooting for of Jan 9th 2008..

----- Original Message -----

From: Lantz.Tracy@epamail.epa.gov
Date: Wednesday, January 30, 2008 3:41 pm
Subject: Fw: Extension 83075-E Update
To: Tom Higgins
Cc: Noble.Velma@epamail.epa.gov

>

> As per the conversation this afternoon, between you, myself and
> my team

> leader Velma Noble, you agreed to a 30 day extension for this
> application.

> We noted that although you had indicated that the corrections to the
> chemistry data would be received by the Agency on 1/9/08, this
> information was not received until 1/25/08. Thus a second
> renegotiation with an additional 30 days of review time is
> necessary to complete the
> review of this application.

>

> Please respond with an e-mail confirming this conversation.

>

> Thanks

> ----- Forwarded by Tracy Lantz/DC/USEPA/US on 01/30/2008 03:36
> PM -----

>

>

> Tracy

>

> Lantz/DC/USEPA/

>

> US

> To

\triangleright

> cc

> Noble/DC/USEPA/US@EPA,

> Dennis

>

> RE: Extension 83075-E

> (Document link: Tracy

 \triangleright

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> You should be keeping me in the loop since there have been

> the date that this material will arrive.

 γ

> due to your delay in sending in the requested information.

> allowed 2

- > renegotiation which means if there are any other problems with

> etc. our only option may be to issue a do not grant letter which means

>

66

> You need to let me know as soon as you send us the information
> and by
> what means you are sending it.
> Once we receive it, I will likely be contacting you for the second
> renegotiation.

>

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>

> Tom Higgins

>

>>

> ptonline.net>

> To

> Tracy Lantz/DC/USEPA/US@EPA

>

> 01/16/2008

> cc

> 08:57 AM Velma

> Noble/DC/USEPA/US@EPA,

> Dennis

> Edwards/DC/USEPA/US@EPA,

> MDVDT@aol.com

>

>

> Subject

> RE: Extension 83075-E

> Update

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United States
Environmental Protection Agency
Washington, DC 20460
Formulator's Exemption Statement
(40 CFR 152.85)

Applicant's Name and Address NBS Technology, LLC PO Box 428 157 Skunks Misery Rd. Locust Valley, New York 11560	EPA File Symbol/Registration Number 83075-E
	Product Name GoldShield 75
	Date of Confidential Statement of Formula (EPA Form 8570-4) 08/15/2007

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

[REDACTED]

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).

(3) Indicate by checking (A) or (B) below which paragraph applies:

☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☐ (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

Source		
Active Ingredient	Product Name	Registration Number
[REDACTED]		
Signature 	Name and Title Theodore Shlisky, VP, COO	Date 08/15/2007

EPA Form 8570-27 (Rev. 06-2004)

Copy 1 - EPA
Copy 2 - Applicant copy



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
1200 Pennsylvania Avenue, N.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number NBS technology, LLC PO Box 428 157 Skunks Misery Rd. Locust Valley, New York 11560	EPA Registration Number/File Symbol 83075- E
Active Ingredient(s) and/or representative test compound(s) 3-(trimethoxysil)propyl dimethyl octadecyl ammonium chloride	Date April 13, 2007
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) surface treatment and textile antimicrobial wiped, sprayed or added to rinse water or dip soaked	Product Name Goldshield 75

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

<input type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	<input checked="" type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).
--	---

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature 	Date 8/15/07	Typed or Printed Name and Title Theodore Shlisky, VP
----------------------	------------------------	--

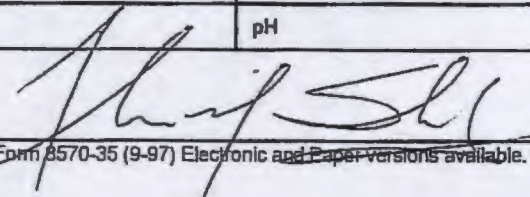


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date 6/2/2008		EPA Reg No./File Symbol 83075-E		Page 1 of 2	
Applicant's/Registrant's Name & Address NBS Technology, LLC PO Box 428, 157 Skunks Misery Road, Locust valley, New York 11560		Product Goldshield 75			
Ingredient					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830-1550	Product identity and composition	47328401	NBS Technology, LLC	own	see attachment
830-1800	Description of the materials used to produce the product	47328401	NBS Technology, LLC	own	see attachment
830-1650	Description of the manufacturing process	cite all	cite all	pay	see attachment
830-1670	Discussion of the formulation of the impurities	47328401	NBS Technology, LLC	own	see attachment
830-1750	Certified Limits	cite all	cite all	pay	see attachment
830-1800	Enforcement analytical method	47197401	NBS Technology, LLC	own	see attachment
830-6303	Physical State	cite all	cite all	pay	see attachment
830-6314	Oxidation reduction chemical comparability	cite all	cite all	pay	see attachment
830-6315	Flammable	cite all	cite all	pay	see attachment
830-6316	Explosibility	cite all	cite all	pay	see attachment
830-6317	Storage Stability	cite all	cite all	pay	see attachment
830-6319	Miscibility	cite all	cite all	pay	see attachment
830-6320	Corrosion Characteristics	cite all	cite all	pay	see attachment
830-6321	Dielectric breakdown Voltage	cite all	cite all	pay	see attachment
830-7000	pH	cite all	cite all	pay	see attachment
Signature 			Name and Title Theodore Shilsky, VP		Date 06/02/2008

EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only Paper version.

Agency Internal Use Copy



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date 6/2/2008

EPA Reg No./File Symbol 83075-E

Page 2 of 2

Applicant's/Registrant's Name & Address

NBS Technology, LLC PO Box 428, 157 Skunks Misery Road, Locust valley, New York 11560

Product

Goldshield 75

Ingredient

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830-7100	viscosity	cite all	cite all	own	see attachment
830-7300	Density/relative density/bulk density	cite all	cite all	own	see attachment
830-1100	Acute oral Toxicity	cite all	cite all	pay	see attachment
830-1200	Acute dermal Toxicity	cite all	cite all	own	see attachment
830-1300	Acute inhalation toxicity - rat	cite all	cite all	pay	see attachment
830-2400	Primary eye irritation	cite all	cite all	own	see attachment
830-2500	Primary dermal irritation	cite all	cite all	pay	see attachment
830-2600	Dermal Sensitization	cite all	cite all	pay	see attachment

Signature

Name and Title

Theodore Shlisky, VP

Date

06/02/2008



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date 6/2/2008	EPA Reg No./File Symbol 83075-E	Page 1 of 2
Applicant's/Registrant's Name & Address NBS Technology, LLC PO Box 428, 157 Skunks Misery Road, Locust valley, New York 11560		Product Goldshield 75

Ingredient

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			NBS Technology, LLC	own	see attachment
			NBS Technology, LLC	own	see attachment
			cite all	pay	see attachment
			NBS Technology, LLC	own	see attachment
			cite all	pay	see attachment
			NBS Technology, LLC	own	see attachment
			cite all	pay	see attachment
			cite all	pay	see attachment
			cite all	pay	see attachment
			cite all	pay	see attachment
			cite all	pay	see attachment
			cite all	pay	see attachment
			cite all	pay	see attachment
			cite all	pay	see attachment
			cite all	pay	see attachment

Signature 	Name and Title Theodore Shifsky, VP	Date 06/02/2008
---------------	--	--------------------

Attachment I
List of Companies

Offer to Pay Letters

CHEMICAL 107401	CHEMICAL NAME 1-Octadecanaminium, N,N-dimethyl-N-(3-(trimethoxysilyl)propyl)-, chloride
COMPANY# 008591 * DATA TYPES * EU AT EC FW EF OT XX XX	NALCO DIVERSIFIED TECHNOLOGIES, INC. PO BOX 200 CHAGRIN FALLS, OH 44022
COMPANY# 048737 * DATA TYPES * EU AT EC FW EF OT XX XX	GOULSTON TECHNOLOGIES, INC. 700 N. JOHNSON ST. MONROE, NC 28110
COMPANY# 063394 * DATA TYPES * EU AT EC FW EF OT XX	AMERICAN CHEMISTRY COUNCIL BIOCIDES PANEL 1300 WILSON BLVD ARLINGTON, VA 22209
COMPANY# 064881 * DATA TYPES * EU AT EC FW EF OT XX XX XX XX XX	AEGIS ENVIRONMENTAL MANAGEMENT INC. 2205 RIDGEWOOD DRIVE MIDLAND, MI 48642
COMPANY# 066607 * DATA TYPES * EU AT EC FW EF OT XX	SPRAY DRIFT TASK FORCE 1900 K STREET, NW WASHINGTON, DC 20006
COMPANY# 070871 * DATA TYPES * EU AT EC FW EF OT XX XX	BIOSHIELD TECHNOLOGIES, INC. 4405 INTERNATIONAL BLVD - STE B109 NORCROSS, GA 30093
COMPANY# 075174 * DATA TYPES * EU AT EC FW EF OT XX	SISHIELD TECHNOLOGIES, INC. 17 EXECUTIVE PARK DRIVE, SUITE 563 ATLANTA, GA 30329
COMPANY# 079652 * DATA TYPES * EU AT EC FW EF OT XX	LAIRD'S REGULATORY CONSULTANTS INC. Agent for: MARINIZE PRODUCTS, INC. SHENSTONE EST. 17804 BRAEMAR PL LEESBURG, VA 20176
COMPANY# 081260 * DATA TYPES * EU AT EC FW EF OT XX	JENNICO2 INC. 4494 ANDERSON DRIVE EAU CLAIRE, WI 54703
COMPANY# 082077 * DATA TYPES * EU AT EC FW EF OT XX	MICROBE GUARD INC. 6901 EAST FISH LAKE ROAD, SUITE 132 MAPLE GROVE, MN 55369

Attachment I

List of Companies

Offer to Pay

CHEMICAL CHEMICAL NAME

107401 1-OCTADECANAMINIUM, n,n-DIEMTYL-n-(3-TRIMETHOXSILYLPROPYL) CHLORIDE

Company # 75497 Nova Biogenetics

EU AT EC FW EF OT 8601 Dunwoody Place, suite 338

XX XX Atlanta, GA 30350

Company# 053053 INDUSCO Ltd.

EU AT EC FW EF OT 2319 Joe Brown Dr.

XX Greensboro, NC 27405

DATA PACKAGE BEAN SHEET

Date: 30-Jan-2008

Page 1 of 3

Decision #: 378983

DP #: (348803)

PRIA

Parent DP#:

*** Registration Information ***

Registration: 83075-E - GOLDSHIELD 75

Company: 83075 - NBS TECHNOLOGY, LLC

Risk Manager: RM 31 - Velma Noble - (703) 308-6233 Room# PY1 S-8855

Risk Manager Reviewer: Tracy Lantz TLANTZ

Sent Date: _____

Calculated Due Date: 10-May-2008

Edited Due Date: _____

Type of Registration: Product Registration - Section 3

Action Desc: (A54) NEW PRODUCT;NON-FAST TRACK;FIFRA SEC. 2(MM) USES;

Ingredients: _____

*** Data Package Information ***

Expedite: ☐ Yes ☒ No

Date Sent: 30-Jan-2008

Due Back: _____

DP Ingredient: _____

DP Title: _____

CSF Included: ☒ Yes ☐ No

Label Included: ☒ Yes ☐ No

Parent DP #: _____

Assigned To

Date In

Date Out

Organization: AD / PSB

Team Name: CTT

Reviewer Name: Chris

Contractor Name: _____

1/30/08

1/30/08

1/30/08

Last Possible Science Due Date: 10-Apr-2008

Science Due Date: 4/15/08

Sub Data Package Due Date: 4/29/08

*** Studies Sent for Review ***

Printed on Page 2

*** Additional Data Package for this Decision ***

Printed on Page 3

*** Data Package Instructions ***

Please review revised product chemistry data in response to our review of 12/15/07 DP343751 by Chris Jiang. This is a renegotiated PRIA with a new due date of 5/10/08. New and prior information attached. This is MRID 47328401.

DATA PACKAGE BEAN SHEET

Date: 30-Jan-2008

Page 1 of 3

Decision #: 378983

DP #: (348803)

PRIA

Parent DP#:

*** Registration Information ***

Registration: **83075-E - GOLDSHIELD 75**

Company: **83075 - NBS TECHNOLOGY, LLC**

Risk Manager: **RM 31 - Velma Noble - (703) 308-6233 Room# PY1 S-8855**

Risk Manager Reviewer: **Tracy Lantz TLANTZ**

Sent Date: _____

Calculated Due Date: **10-May-2008**

Edited Due Date: _____

Type of Registration: **Product Registration - Section 3**

Action Desc: **(A54) NEW PRODUCT;NON-FAST TRACK;FIFRA SEC. 2(MM) USES;**

Ingredients: _____

*** Data Package Information ***

Expedite: ☐ Yes ☒ No

Date Sent: **30-Jan-2008**

Due Back: _____

DP Ingredient: _____

DP Title: _____

CSF Included: ☒ Yes ☐ No

Label Included: ☒ Yes ☐ No

Parent DP #: _____

Assigned To

Date In

Date Out

Organization: **AD / PSB**

Last Possible Science Due Date: **10-Apr-2008**

Team Name: **CTT**

Science Due Date: _____

Reviewer Name: _____

Sub Data Package Due Date: _____

Contractor Name: _____

*** Studies Sent for Review ***

Printed on Page 2

*** Additional Data Package for this Decision ***

Printed on Page 3

*** Data Package Instructions ***

Please review revised product chemistry data in response to our review of 12/15/07 DP343751 by Chris Jiang. This is a renegotiated PRIA with a new due date of 5/10/08. New and prior information attached. This is MRID 47328401.

TASK ASSIGNMENT FORM
Antimicrobial Division/Regulatory Management Branch II

A	Completed by Product Manager						
PRODUCT REVIEWER: <u>Tracy Lantz</u>					RMB <u>I</u> TEAM <u>31</u>		
Description of Action: <u>New Product / Tox + Chem review</u>					EPA File Symbol/Reg No. <u>83075-E</u>		
Decision No. <u>D 378983</u>		Submission No. <u>S 809596</u>		Fee for Service Action Code: <u>A54</u>			
FQPA Action Code:		Non-FQPA Action Code:		Fee for Service Fee: \$ <u>4200</u>			
	MONTH		DAY		YEAR		
APPLICATION DATE	1	15	2008				
EPA PIN DATE	1	25	2008				
REVIEWER ASSIGNED DATE	1	29	2008				
DATE DUE FROM SCIENCE	4	28	2008				
DATE DUE TO PM	5	10	2008				
Type of Data:	PSB Product Chemistry <input checked="" type="checkbox"/>	PSB Acute Toxicology <input type="checkbox"/>	PSB Efficacy <input type="checkbox"/>	RASSB Environmental Fate <input type="checkbox"/>	RASSB Ecological Effects <input type="checkbox"/>	RASSB Chronic Toxicology <input type="checkbox"/>	RASSB Exposure <input type="checkbox"/>
<p>COMMENTS: NOTE TO ARCTIC SLOPE - PLEASE COMPLETE PART B OF FORM.</p> <p><i>Karen: Please review revised product chemistry data in response to our review of 12/15/07 DP343751 by Chris Jiang. This is a renegotiated PRIA with a new due date of 5/10/08. New and prior information attached. This is MRID 47328401.</i></p>							
<p>ATTACHMENTS: <input checked="" type="checkbox"/> LABELING <input checked="" type="checkbox"/> CSF(S) <input checked="" type="checkbox"/> DATA <input type="checkbox"/> OTHERS</p>							
B	For Arctic Slope Contract Only						
Contractor: Arctic Slope				Contract No. 0332		ARCTIC SLOPE/MANAGER	
Draft Task: Signature _____ (Est. hrs)				Final Task: Signature _____ (Total hrs)			
C	Reviewer's Comments:						
DATE FEE PAID: _____				RESPONSE CODE: _____		RESPONSE DATE: _____	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION,
PESTICIDES
AND TOXIC
SUBSTANCES

April 10, 2008

DP BARCODE: D348803

MRID: 47328401, 47197401

SUBJECT: Goldshield 75

REG. NO. OR FILE SYMBOL: 83075-E

DOCUMENT TYPE: Product Chemistry Review

Manufacturing-use [] OR End-use Product [X]

INGREDIENTS (PC Codes): 107403

CAS Number: 199111-50-7

TEST LAB: N/A

SUBMITTER: NBS Technology, LLC

GUIDELINE: 830 Guidelines

COMMODITIES: Formulation

REVIEWER: Chris Jiang *CJ*

ORGANIZATION: AD

APPROVER: Karen P. Hicks

APPROVED DATE: 4/10/08

COMMENT:



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION,
PESTICIDES
AND TOXIC
SUBSTANCES

April 10, 2008

MEMORANDUM

Subject: Review for 83075-E

From: Chris Jiang, Chemist
Chemistry and Toxicology Team
Product Science Branch
Antimicrobials Division (7510P)

Thru: Karen P. Hicks, CT Team Leader
Chemistry and Toxicology Team
Product Science Branch
Antimicrobials Division (7510P)

Thru: Michele E. Wingfield, Chief
Product Science Branch
Antimicrobials Division (7510P)

To: Velma Noble PM 31\Tracy Lantz
Regulatory Management Branch I
Antimicrobials Division (7510P)

Applicant: NBS Technology, LLC

Chris Jiang

Karen P. Hicks

Formulation from Label

<u>Active Ingredient(s)</u>	<u>% by wt.</u>
3-(Trihydroxysilyl)propyldimethyloctadecyl ammonium chloride	0.75 %
<u>Other Ingredients</u>	99.25 %
Total	100.0 %

BACKGROUND:

The registrant has submitted a response to the product chemistry review dated December 15, 2007. The response includes a label, pre- and post-reaction CSFs submitted on the registrant's own accord, and MRIDs 47328401 and 47197401.

FINDINGS:

1. The active ingredient on the post-reaction Confidential Statement of Formula (CSF dated 1/16/08) is consistent with the label declaration. In future submissions, the
> registrant should make column 13a equal to column 13b and make columns 13a and 13b equate to 100% exactly.
2. All ingredients are cleared for use in pesticidal formulations.
3. On the pre- and post-reaction CSFs, the CAS number for the stabilizer is written
> as [REDACTED] when the correct CAS number is [REDACTED]. This change on the CSFs does not need to go to science for review.
4. The product identity and composition is **acceptable**. The CAS number for the
> resultant compound of the post-reaction CSF is 199111-50-7 and not 27668-52-6 as indicated in the study. This change does not need to go to science for review.
5. The descriptions of the starting materials and the formulation process are **acceptable**.
6. The discussion of the formation of impurities is **acceptable**.
7. The preliminary analysis is **acceptable**.
8. The certified limits are **acceptable**.
9. The enforcement analytical method is **acceptable**. In future submissions, the registrant should include an equation detailing the calculation of the percentage (weight by weight) of the active ingredient with each variable clearly defined.
10. The submittal of samples is **acceptable**.
11. The viscosity is **acceptable** as the viscosity was determined to be 6 centipoise.
12. The remainder of the chemistry requirements were reviewed and accepted in the review done under D343751.

CONCLUSIONS:

Product Science Branch of Antimicrobials Division finds the submission for 83075-E to be acceptable with comments. The registrant must correct the discrepancies listed in the findings.

NBS Technology, LLC

473284-00

157 Skunks Misery Rd.

P.O.Box 428

Locust Valley, New York 11560

516.674.4085P

thigginsnbst@optonline.net

516.759.5309 F

Jan.15th, 2008

Document Processing Desk (RESUB)

Att: Velma Noble

Office of Pesticide Programs

Environmental Protection Agency

Washington , DC 20460

Re: Request to cure deficiencies of EPA Findings dated Dec.18, 2007

47328401

OPP Decision Number D 378983

Product Name: Goldshield 75

EPA File Symbol: 83075-E

Application Date: April 20, 2007

For the purposes of this submission we will address only those deficiencies articulated in the Dec. 18, letter, which need to be cured and will follow the number sequence in your letter under "findings".

Attachments:

1. Attachment #7a. (CONFIDENTIAL ATTACHMENTS)Pre & Post Confidential Statements of Formulations
2. Attachment # 1; Form 8570-1, stating "similar to" & "me too" label not chemistry
3. Product Identity, 830.1550 Attachment #7b.(CONFIDENTIAL ATTACHMENTS)
4. Starting materials, 830.1600 Attachment #2
5. Description of formulation process, 830.1650, Attachment # 3
6. Formation of impurities, 830.1670, Attachment #4
7. Preliminary analysis; Attachment # 4a.
8. Certified limits calculations; Pre & Post CSF forms Attachment # 7a (CONFIDENTIAL ATTACHMENTS)
9. Enforcement analytical method, Attachment # 5
10. Sample availability statement , Attachment #5 a.
11. Curing of box 17 on CSF forms; Attachments 7a (CONFIDENTIAL ATTACHMENTS)
12. Form 8570-36 resubmission for clarity on viscosity Attachment #6

Sincerely,

Tom Higgins

Summary response to your Dec 18, 2007 letter.

FINDINGS:

1. The active ingredient on the Confidential Statement of Formula (CSF) (dated 8/17/07) is inconsistent with label.

Response: To cure this deficiency we have supplied "pre and post" CSF forms after consultation with Chris Jiang, Chemist EPA, [REDACTED]

[REDACTED] See enclosed Data Requirement of CONFIDENTIAL MATERIAL attachment # 7 a.

3. The registrant has submitted Form 8570-1 stating that the proposed formulation is identical to 70781-5; however, the proposed product is not identical to cited product.

Response: NBS has re-submitted form 8570-1 eliminating the word identical and states only "similar to". We are "**me-too(ing)**" the label not the chemistry. See attachment no #1

4. The product identity and composition is unacceptable because this requirement was not addressed. The registrant must read guideline 830.1550

Response: The active ingredient has been reflected in the Pre- and Post CSF forms. Reference MSDS sheets filed with the pre-registered product 83075-1. See enclosed data requirement of CONFIDENTIAL MATERIAL, attachment # 7.b.

5. The description of the starting materials is unacceptable because this requirement was not addressed. The registrant must read guideline 830.1600

Response: The starting materials are reflected in the new CSF forms and the Statement of formulation. See data requirement 830.1600 enclosed in Attachment no 2.

6. The description of the formulation process is unacceptable because this requirement was not addressed. The registrant must read guideline 830.1650.

Response: NBS has submitted the data requirement of the formulation process in the statement of formulation. [REDACTED]

[REDACTED] See attachment #3

7. The discussion of the formation of impurities is unacceptable because this requirement was not addressed. The registrant must read guidelines 830.1670.

Response: This manufacturing process is a simple mixing process, by blending registered ingredients, which result in no impurities. See attachment no #4.

8. The preliminary analysis is unacceptable because this requirement was not addressed. See data requirement enclosed.

Response: We are using registered sources of materials therefore this is not applicable.

9. The certified limits cannot be calculated because of the inconsistency between the CSF and label and because the data requirements that are not addressed in the submission.

Response: NBS has re-submitted pre and post CSF forms stating the above which provides a consistency with our labeling. See attachment no #7 a.

10. The enforcement analytical method is unacceptable. The method must be a thorough narrative detailing the list of materials used, the reagents used for assay (complete with normality and standardization procedures), instrumentation, sample preparation, how to prepare solutions, and the equation [percentage (weight by weight)] with each variable defined.

Response: As referenced to "Analytical method", the format and procedure were previously accepted by the EPA. See Attachment #5

11. The Submittal of samples is unacceptable as this requirement was not addresses in the submission. The registrant needs to state that samples are available upon request.

Response: Any and all samples are available upon request. 5Q.

13. Box 17 of the CSF is left blank.

Response: CSF forms have been cured and fixed. See CONFIDENTIAL MATERIALS attachment no. 7Q.

21. The viscosity is unacceptable. The self-certification states that the viscosity of the liquid is less than 85.5 mPas; however the Agency needs a finite value. See attachment #6 form 8570-36

Response: The viscosity of Goldshield 75 is 6 centipoises using a Brookfield viscometer LVF model with spindle #2 at 60 rpm. Please see revised form 8570-36, see attachment #.6.

3/21

DATA PACKAGE BEAN SHEET

Date: 11-Sep-2007

Page 1 of 2

Decision #: 378983

DP #: (343762)

PRIA

Parent DP#:

*** Registration Information ***

Registration: 83075-E - GOLDSHIELD 75

Company: 83075 - NBS TECHNOLOGY, LLC

Risk Manager: RM 31 - Velma Noble - (703) 308-6233 Room# PY1 S-8855

Risk Manager Reviewer: Tracy Lantz TLANTZ

Sent Date: _____

Calculated Due Date: 19-Sep-2007

Edited Due Date: _____

Type of Registration: Product Registration - Section 3

Action Desc: (A54) NEW PRODUCT;NON-FAST TRACK;FIFRA SEC. 2(MM) USES;

Ingredients: _____

PRIA

Late -
New date
needed
see PM
ASAP

*** Data Package Information ***

Expedite: ☐ Yes ☒ No

Date Sent: 11-Sep-2007

Due Back: _____

DP Ingredient: _____

DP Title: _____

CSF Included: ☒ Yes ☐ No

Label Included: ☒ Yes ☐ No

Parent DP #: _____

Assigned To

Organization: AD / PSB

Team Name: CTT

Reviewer Name: JAN B

Contractor Name: _____

Date In

Date Out

9/11/07

12/18/07

9/14/07

12/18/07

9/12/07

12/18/07

Last Possible Science Due Date: 20-Aug-2007

Science Due Date: 11/25/07

Sub Data Package Due Date: 12/10/07

120
90

*** Studies Sent for Review ***

No Studies

*** Additional Data Package for this Decision ***

Printed on Page 2

*** Data Package Instructions ***

Please do tox bridging. This product would like to cite tox data from 70871-19 (was 70871-5). Have also included a waiver for dermal sensitization CSF's and proposed label included. Clock should start in next few days.

DATA PACKAGE BEAN SHEET

Date: 02-Oct-2007

Page 1 of 2

Decision #: 378983

DP #: (343762)

PRIA

Parent DP#:

*** Registration Information ***

Registration: 83075-E - GOLDSHIELD 75

Company: 83075 - NBS TECHNOLOGY, LLC

Risk Manager: RM 31 - Velma Noble - (703) 308-6233 Room# PY1 S-8855

Risk Manager Reviewer: Tracy Lantz TLANTZ

Sent Date: _____

Calculated Due Date: 10-Jan-2008

Edited Due Date: _____

Type of Registration: Product Registration - Section 3

Action Desc: (A54) NEW PRODUCT;NON-FAST TRACK;FIFRA SEC. 2(MM) USES;

Ingredients: _____

*** Data Package Information ***

Expedite: ☐ Yes ☒ No

Date Sent: 11-Sep-2007

Due Back: _____

DP Ingredient: _____

DP Title: _____

CSF Included: ☒ Yes ☐ No

Label Included: ☒ Yes ☐ No

Parent DP #: _____

Assigned To

Date In

Date Out

Organization: AD / PSB

11-Sep-2007

Last Possible Science Due Date: 11-Dec-2007

Team Name: CTT

11-Sep-2007

Science Due Date: 10-Dec-2007

Reviewer Name: Blackwell, Ian

13-Sep-2007

Sub Data Package Due Date: 10-Dec-2007

Contractor Name: _____

*** Studies Sent for Review ***

No Studies

*** Additional Data Package for this Decision ***

Printed on Page 2

*** Data Package Instructions ***

Please do tox bridging. This product would like to cite tox data from 70871-19 (was 70871-5). Have also included a waiver for dermal sensitization CSF's and proposed label included. Clock should start in next few days.

TASK ASSIGNMENT FORM
Antimicrobial Division/Regulatory Management Branch II

A	Completed by Product Manager							
PRODUCT REVIEWER: <u>Tracy Lantz</u>						RMB <u>I</u> TEAM <u>31</u>		
Description of Action: <u>Registration of new product</u>						EPA File Symbol/Reg No. <u>83075-E</u>		
Decision No. <u>D378983</u>		Submission No. <u>S 809596</u>		Fee for Service Action Code: <u>A54</u>				
FQPA Action Code: _____		Non-FQPA Action Code: _____		Fee for Service Fee: \$ <u>4200</u>				
		MONTH		DAY		YEAR		
APPLICATION DATE		4		20		2005 2007		
EPA PIN DATE		8		21		2005 2007		
REVIEWER ASSIGNED DATE		9		5		2005 2007		
DATE DUE FROM SCIENCE		12		1		2005 2007		
DATE DUE TO PM		1		1		2005 2008		
Type of Data:	PSB Product Chemistry <input type="checkbox"/>	PSB Acute Toxicology <input checked="" type="checkbox"/>	PSB Efficacy <input type="checkbox"/>	RASSB Environmental Fate <input type="checkbox"/>	RASSB Ecological Effects <input type="checkbox"/>	RASSB Chronic Toxicology <input type="checkbox"/>	RASSB Exposure <input type="checkbox"/>	
<p>COMMENTS: NOTE TO ARCTIC SLOPE - PLEASE COMPLETE PART B OF FORM.</p> <p>Karen: Please do tox bridging. This product would like to cite tox data from 70871-19 (was 70871-5). Have also included a waiver for dermal sensitization. CSF's and proposed label included. Clock should start in next few days.</p>								
ATTACHMENTS: <input checked="" type="checkbox"/> LABELING <input checked="" type="checkbox"/> CSF(S) <input checked="" type="checkbox"/> DATA <input type="checkbox"/> OTHERS								
B	For Arctic Slope Contract Only							
Contractor: Arctic Slope				Contract No.: 0332		ARCTIC SLOPE MANAGER		
Draft Task: Signature _____ (Est. hrs)				Final Task: Signature _____ (Total hrs)				
C	Reviewer's Comments:							
DATE FEE PAID: _____				RESPONSE CODE: _____		RESPONSE DATE <u>94</u>		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Thursday, December 13, 2007

MEMORANDUM

Subject: Acute Toxicity Review for EPA Reg. No.: 83075-E/ Goldshield 75
DP Barcode: D343762

From: Ian Blackwell, Biologist *IB*
Chemistry and Toxicology Team
Product Science Branch
Antimicrobials Division (7510P)

Through: Karen Hicks, Team Leader
Chemistry and Toxicology Team
Product Science Branch
Antimicrobials Division (7510P)

Michele E. Wingfield, Chief *Michele E. Wingfield*
Product Science Branch
Antimicrobials Division (7510P)

To: Velma Noble, PM 31/ Tracy Lantz
Regulatory Management Branch
Antimicrobials Division (7510P)

Applicant: NBS Technology

FORMULATION FROM LABEL:

<u>Active Ingredient(s):</u>	<u>% by wt.</u>
3-(Trihydroxysilyl)propyldimethyloctadecyl ammonium chloride	0.75
<u>Other Ingredient(s):</u>	<u>99.25</u>
Total:	100.00

1) **BACKGROUND:** NBS Technology has submitted a request for a Similarity Clinic determination. To support the acute toxicity requirements for their product "Goldshield 75", the registrant asks to cite data from EPA Registration Number 70871-19. The cited product (70871-19) was formerly assigned Registration Number 70871-5.

2) **RECOMMENDATIONS:** PSB findings are:

- a) At this time, the Chemistry and Toxicology Team (CTT) cannot say whether 83075-E is Substantially Similar to 70871-19. The Chemistry and Toxicology Team (CTT) was not able to locate enough information to adequately assess the similarity of 83075-E to 70871-19.
- b) CTT finds File Symbol 83075-E Substantially Similar to Registration Number 64881-6. This product was found during a search of Agency records. To support the acute toxicity requirements for 83075-E, CTT cites the 2/27/06 CTT review of 64881-6.
- c) If the registrants do not want to cite acute toxicity data from 64881-6, they will have to find an alternate method of data support for 83075-E.

The acute toxicity profile for Registration Number 83075-E is currently:

Study	MRID Number	Toxicity Category	Status
Acute Oral Toxicity	466938-03	IV	Cited
Acute Dermal Toxicity	466938-04	IV	Cited
Acute Inhalation Toxicity	466938-07	IV	Cited
Primary Eye Irritation	466938-08	IV	Cited
Primary Skin Irritation	466938-05	IV	Cited
Dermal Sensitization	466938-06	Nonsensitizer	Cited

3) **LABELING:**

- a) No precautionary labeling is required for this product due to its acute toxicity profile. However, the registrants may choose to utilize toxicity category III labeling statements for the Signal Word, Precautionary Statements and/or First Aid statements if they choose to do so.



Michele
Wingfield/DC/USEPA/US
12/14/2007 09:43 AM

To Ian Blackwell/DC/USEPA/US@EPA
cc
bcc

Subject Re: Fw: Tox review for 83075-E, PRIA due 1/10/08

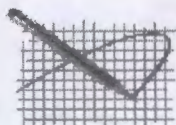
History:

✉ This message has been replied to.

Sounds like a plan.

Michele E. Wingfield, Chief
Product Science Branch
Antimicrobials Division (7510P)
Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Avenue N.W.
Washington, D.C. 20640

Ph. 703-308-6349
Fax. 703-305-5620
Ian Blackwell/DC/USEPA/US



Ian Blackwell/DC/USEPA/US
12/14/2007 09:23 AM

To Karen Hicks/DC/USEPA/US@EPA
cc Michele Wingfield/DC/USEPA/US@EPA, Wallace
Powell/DC/USEPA/US@EPA, Tracy
Lantz/DC/USEPA/US@EPA
Subject Fw: Tox review for 83075-E, PRIA due 1/10/08

Karen, Michele,

This one has way too much going on. It kind of embarrasses me; but, I just cannot even get to the point where I can come up with two formulations to compare. I plan to just state that, reject the citation request, and get on to my otherwork.

Also, there is no current CSF (that I can find) for 70871-16.

Ian Blackwell
Chemistry and Toxicology Team
Product Science Branch
Antimicrobials Division
Office of Pesticide Programs
U.S. Environmental Protection Agency
2777 S. Crystal Drive
Arlington, VA 22202

—Forwarded by Ian Blackwell/DC/USEPA/US on 12/14/2007 09:19AM —

To: Ian Blackwell/DC/USEPA/US@EPA
From: Tracy Lantz/DC/USEPA/US

Date: 12/13/2007 05:09PM

cc: Michele Wingfield/DC/USEPA/US@EPA, Dennis Edwards/DC/USEPA/US@EPA, Velma Noble/DC/USEPA/US@EPA

Subject: Tox review for 83075-E, PRIA due 1/10/08

I don't know exactly how to advise you. I will not be in the office tomorrow. I suggest that you either get advise from Dennis or Wallace.

But if you think what they are doing will not work, do not hesitate to call this unacceptable. Chris has already told me that I will need to renegotiate on the Chemistry so we can ask for the appropriate toxicity information if you feel you do not have what you need to support this product

Ian Blackwell/DC/USEPA/US

**Ian
Blackwell/D
C/USEPA/US**

12/13/2007
05:02 PM

To Michele Wingfield/DC/USEPA/US@EPA, Tracy Lantz/DC/USEPA/US@EPA

cc Wallace Powell

Subj: Tox review for 83075-E Link
ect

Tracy and Michele,

I am very sorry, but I just cannot finish this one today. It is WAY too complicated. I have to sit down with another person to work this one out. What do I mean? Well, here are a few issues:

There is no way I could have foreseen even HALF of this before I started on this review.

How do you all want me to handle this???

Ian Blackwell
Chemistry and Toxicology Team
Product Science Branch
Antimicrobials Division
Office of Pesticide Programs
U.S. Environmental Protection Agency
2777 S. Crystal Drive
Arlington, VA 22202

(Determination from &*\$%.)

Michele Wingfield/DC/USEPA/US

**Michele
Wingfield/DC/US
EPA/US**

12/13/2007 03:55
PM

To Ian Blackwell/DC/USEPA/US@EPA

cc

Subject: Re: Tox review for 83075-ELink

Thanks, I appreciate it.

Michele

Michele E. Wingfield, Chief
Product Science Branch
Antimicrobials Division (7510P)
Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Avenue N.W.
Washington, D.C. 20640

Ph. 703-308-6349
Fax. 703-305-5620

-----Ian Blackwell/DC/USEPA/US wrote: -----

To: Michele Wingfield/DC/USEPA/US@EPA
From: Ian Blackwell/DC/USEPA/US
Date: 12/13/2007 03:16PM
Subject: Re: Tox review for 83075-E

Michele,

I was trying to get more brain power on the subject as I worked on it. I guess trying to kill two birds with one stone. However, I do see your point and will try to follow your request.

Thanks,
Ian Blackwell
Chemistry and Toxicology Team
Product Science Branch
Antimicrobials Division
Office of Pesticide Programs
U.S. Environmental Protection Agency
2777 S. Crystal Drive
Arlington, VA 22202

▼ Michele Wingfield/DC/USEPA/US

**Michele
Wingfield
/DC/USE
PA/US**

12/13/2007
02:41 PM

To **Ian
Blackwell/DC/USEPA/U
S@EPA**

cc

Subject **Re: Tox review for
83075-E ▼**

Ian,

I truly appreciate your willingness to help train Earl and Leon. However, in the interest of time for completing your reviews, you should devote more time to completion of a review, rather than walking them (and Chris) through it as you go.

Thanks
Michele
Michele E. Wingfield, Chief
Product Science Branch
Antimicrobials Division (7510P)
Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Avenue N.W.
Washington, D.C. 20640

Ph. 703-308-6349
Fax. 703-305-5620

——Ian Blackwell/DC/USEPA/US wrote: ——

To: Karen Hicks/DC/USEPA/US@EPA
From: Ian Blackwell/DC/USEPA/US
Date: 12/13/2007 02:13PM
cc: Dennis Edwards/DC/USEPA/US@EPA, Michele Wingfield/DC/USEPA/US@EPA, Tracy
Lantz/DC/USEPA/US@EPA, Velma Noble/DC/USEPA/US@EPA
Subject: Re: Tox review for 83075-E

Tracy,

I have been working on it (will Chris, Leon and Earl) for a few hours today. I am trying to complete it today.

Ian Blackwell
Chemistry and Toxicology Team
Product Science Branch
Antimicrobials Division

Office of Pesticide Programs
U.S. Environmental Protection Agency
2777 S. Crystal Drive
Arlington, VA 22202

Karen Hicks/DC/USEPA/US

To Tracy
Lantz/DC/USEPA/US@EPA

cc Dennis
Edwards/DC/USEPA/US
@EPA, Ian
Blackwell/DC/USEPA/US
@EPA, Michele
Wingfield/DC/USEPA/US
@EPA, Velma
Noble/DC/USEPA/US@EPA

Subject: Tox review for
ect83075-E

Ian, please let Tracy know the status ASAP.

Tracy Lantz/DC/USEPA/US

To Ian
Blackwell/DC/USEPA/US
@EPA

cc Karen
Hicks/DC/USEPA/US@E
PA, Velma
Noble/DC/USEPA/US@E
PA, Michele
Wingfield/DC/USEPA/US
@EPA, Dennis
Edwards/DC/USEPA/US
@EPA

Subject: Tox review for 83075-E
ect

Please advise as to the status of this review.

This is a tox bridging review for 83075-E, Decision 378983, Submission 809596, DP 343762.

This submission is due out of the Agency on 1/10/08 and I suspect there may be problems so would like your review as soon as possible so that we can start the renegotiation process in a timely fashion.

Thanks

Rationale for Waiver of Dermal Sensitization Data Requirement
03 August 2007

Neither the active ingredient or any of the other ingredients in the proposed formulation are dermal sensitizers. Consequently, the dermal sensitization data requirements should be waived.

**Summary Information For
Product Registration - Section 3
70871-16**

Registration #: 70871-16
Registration Name: BIOSHIELD AM 500 I
Company: 70871 - INHOLD, LLC
Current Status: Active - Conditionally Registered (13-Oct-1998)
Restricted Use: No

Active Ingredients

PC Code	CAS #	Ingredient Name	Percent Active
107401	27668-52-6	1-Octadecanaminium, N,N-dimethyl-N-(3-(trimethoxysilyl) propyl)-, chloride	5
Total Rows: 1			

Organization: AD / RMB1
Team: Antimicrobials Division, Risk Management Team 31
Noble, Velma (703) 308-6233
Child Resistant Package:
Signal Word: Warning
Physical Form: Soluble Concentrate
Pesticide Category: ANTIMICROBIAL
BACTERIOSTAT
FUNGICIDE
ALGAECIDE
MICROBICIDE/MICROBISTAT
Label Image: [View Label Image](#)

Inert Ingredients

[EPA Home](#) | [OPP-Home](#) | [Search](#) | [Help](#)

Last updated on February 4, 2004, Version 1.4
<http://dcopp10gas01:7777/pls/prism10p>



Tracy Lantz/DC/USEPA/US
04/09/2008 10:26 AM

To Thomas Higgins <thigginsnbst@optonline.net>
cc
bcc
Subject Re: up date

I am still waiting for the chemistry review, which should be completed soon.
If any additional information is required once this review is complete, I will contact you.
We are currently scheduled to complete your application by 6/10/08.

There is not a website to check status, you just contact me.
Again, I will be in contact with you should there be any concerns regarding the submitted chemistry data.
Thanks.

Thomas Higgins <thigginsnbst@optonline.net>



Thomas Higgins
<thigginsnbst@optonline.net>

04/09/2008 09:04 AM

To Tracy Lantz/DC/USEPA/US@EPA
cc
Subject up date

Hi Tracy,

It's been a few months since we last spoke, and I am aware of the allocation time for EPA to review our application, but I was wondering if it is possible to get the status of it, 83075-E? Not sure if there is a site we can visit that would show the work- in- process of review. Appreciate it if you could get back to me and I thank you in advance.

President/CEO
NBS Technology LLC
516.674.4085 P
516.759.5309 F
516.592.2847 C
thigginsnbst@optonline.net
www.nbstgoldshield.com



thigginsnbst@optonline.net
02/05/2008 08:16 PM

To Tracy Lantz/DC/USEPA/US@EPA
cc Velma Noble/DC/USEPA/US@EPA
bcc
Subject Re: Fw: Extension 83075-E Update

Noted, although with all the time and interaction we had with Chris Jiang, we're certainly hoping there is nothing that would need curing. But I understand your email.

----- Original Message -----

From: Lantz.Tracy@epamail.epa.gov
Date: Tuesday, February 5, 2008 6:32 pm
Subject: Re: Fw: Extension 83075-E Update
To: thigginsnbst@optonline.net
Cc: Noble.Velma@epamail.epa.gov

> Thanks for your reply on the 30 day extension.
>
> Please be aware as per my message to you of 1/16/08 that this is your
> final renegotiation for this product. If there are any other problems
> with this data or submission which are not quickly correctable,
> our only
> option may be to issue a do not grant letter. Issuing a do not grant
> letter means you would be required to start the process over
> again and
> possibly pay a new fee.
>
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>
>
> thigginsnbst@op
>
> tonline.net
>
>
> To
> 01/30/2008 Tracy Lantz/DC/USEPA/US@EPA
>
> 03:56 PM
> cc
> Velma
> Noble/DC/USEPA/US@EPA,
> MDVDT@aol.com
>
>



Tracy Lantz/DC/USEPA/US
02/05/2008 06:27 PM

To thigginsbst@optonline.net
cc Velma Noble/DC/USEPA/US
bcc

Subject Re: Fw: Extension 83075-E Update

Thanks for your reply on the 30 day extension.
Please be aware as per my message to you of 1/16/08 that this is your final renegotiation for this product. If there are any other problems with this data or submission which are not quickly correctable, our only option may be to issue a do not grant letter. Issuing a do not grant letter means you would be required to start the process over again and possibly pay a new fee.
thigginsbst@optonline.net



thigginsbst@optonline.net
01/30/2008 03:56 PM

To Tracy Lantz/DC/USEPA/US@EPA
cc Velma Noble/DC/USEPA/US@EPA, MDVDT@aol.com
Subject Re: Fw: Extension 83075-E Update

I agree to the thirty day extension, which was [as I discussed by phone today] precipitated as a result of not having your chemist fully understand the chemistry of the technology and [REDACTED] our csf forms. To have submitted data until that was cleared up would have been a fools errand. I am also mindful of the holidays and vacation days that factored into our inability to meet the target date we had been shooting for of Jan 9th 2008..

----- Original Message -----

From: Lantz.Tracy@epamail.epa.gov
Date: Wednesday, January 30, 2008 3:41 pm
Subject: Fw: Extension 83075-E Update
To: Tom Higgins
Cc: Noble.Velma@epamail.epa.gov

- >
- > As per the conversation this afternoon, between you, myself and
- > my team
- > leader Velma Noble, you agreed to a 30 day extension for this
- > application.
- > We noted that although you had indicated that the corrections to the
- > chemistry data would be received by the Agency on 1/9/08, this
- > information was not received until 1/25/08. Thus a second
- > renegotiation with an additional 30 days of review time is
- > necessary to complete the
- > review of this application.
- >



thigginsnbst@optonline.net
01/30/2008 03:56 PM

To Tracy Lantz/DC/USEPA/US@EPA
cc Velma Noble/DC/USEPA/US@EPA, MDVDT@aol.com
bcc
Subject Re: Fw: Extension 83075-E Update

I agree to the thirty day extension, which was [as I discussed by phone today] precipitated as a result of not having your chemist fully understand the chemistry of the technology and [REDACTED] our csf forms. To have submitted data until that was cleared up would have been a fools errand. I am also mindful of the holidays and vacation days that factored into our inability to meet the target date we had been shooting for of Jan 9th 2008..

----- Original Message -----

From: Lantz.Tracy@epamail.epa.gov
Date: Wednesday, January 30, 2008 3:41 pm
Subject: Fw: Extension 83075-E Update
To: Tom Higgins
Cc: Noble.Velma@epamail.epa.gov

>
> As per the conversation this afternoon, between you, myself and
> my team
> leader Velma Noble, you agreed to a 30 day extension for this
> application.
> We noted that although you had indicated that the corrections to the
> chemistry data would be received by the Agency on 1/9/08, this
> information was not received until 1/25/08. Thus a second
> renegotiation with an additional 30 days of review time is
> necessary to complete the
> review of this application.
>
> Please respond with an e-mail confirming this conversation.
>
> Thanks
> ----- Forwarded by Tracy Lantz/DC/USEPA/US on 01/30/2008 03:36
> PM -----
>
>
> Tracy
>
> Lantz/DC/USEPA/
>
> US
> To

> Tom Higgins
>
> 01/30/2008
>
> 11:21 AM
> cc
> Velma Noble/DC/USEPA/US@EPA
>
>
> Subject
> Fw: Extension 83075-E
> Update
>
>
>
>
>
>
>
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>
> Velma and I will be contacting you today sometime between 1:30
> and 2:00
> PM to discuss the second and final renegotiation for this
> product (as
> per my 1/16/08 message below).
> I hope you will be available at this time.
> ----- Forwarded by Tracy Lantz/DC/USEPA/US on 01/30/2008 11:19
> AM -----
>
>
>
> Tracy
>
> Lantz/DC/USEPA/
>
> US
> To
> Tom Higgins
>

> 01/16/2008

>

> 09:57 AM

> cc

> Velma

> Noble/DC/USEPA/US@EPA,

> Dennis

> Edwards/DC/USEPA/US@EPA

>

> Subject

> RE: Extension 83075-E

> Update

> (Document link: Tracy

> Lantz)

>

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> You told us we would have this information in house by the 9th.

> You should be keeping me in the loop since there have been

> changes in

> the date that this material will arrive.

>

> The real problem is that we will likely need to renegotiate this again

> due to your delay in sending in the requested information.

> The biggest problem with this is that each company is only

> allowed 2

> renegotiations per submission. This would use up your second

> renegotiation which means if there are any other problems with

> the data,

> etc. our only option may be to issue a do not grant letter which means

> you would be required to start all over again and pay a new fee.

>

> Are you planning to send this material by overnight delivery?



Tracy Lantz/DC/USEPA/US
01/30/2008 03:36 PM

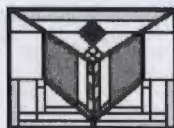
To Tom Higgins <thigginsnbst@optonline.net>
cc Velma Noble/DC/USEPA/US
bcc
Subject Fw: Extension 83075-E Update

As per the conversation this afternoon, between you, myself and my team leader Velma Noble, you agreed to a 30 day extension for this application. We noted that although you had indicated that the corrections to the chemistry data would be received by the Agency on 1/9/08, this information was not received until 1/25/08. Thus a second renegotiation with an additional 30 days of review time is necessary to complete the review of this application.

Please respond with an e-mail confirming this conversation.

Thanks

— Forwarded by Tracy Lantz/DC/USEPA/US on 01/30/2008 03:36 PM —



Tracy Lantz/DC/USEPA/US
01/30/2008 11:21 AM

To Tom Higgins <thigginsnbst@optonline.net>
cc Velma Noble/DC/USEPA/US@EPA
Subject Fw: Extension 83075-E Update

Velma and I will be contacting you today sometime between 1:30 and 2:00 PM to discuss the second and final renegotiation for this product (as per my 1/16/08 message below). I hope you will be available at this time.

— Forwarded by Tracy Lantz/DC/USEPA/US on 01/30/2008 11:19 AM —



Tracy Lantz/DC/USEPA/US
01/16/2008 09:57 AM

To Tom Higgins <thigginsnbst@optonline.net>
cc Velma Noble/DC/USEPA/US@EPA, Dennis Edwards/DC/USEPA/US@EPA
Subject RE: Extension 83075-E Update

You told us we would have this information in house by the 9th. You should be keeping me in the loop since there have been changes in the date that this material will arrive.

The real problem is that we will likely need to renegotiate this again due to your delay in sending in the requested information.

The biggest problem with this is that each company is only allowed 2 renegotiations per submission. This would use up your second renegotiation which means if there are any other problems with the data etc. our only option may be to issue a do not grant letter which means you would be required to start all over again and pay a new fee.

Are you planning to send this material by overnight delivery?

You need to let me know as soon as you send us the information and by what means you are sending it. Once we receive it, I will likely be contacting you for the second renegotiation.

Tom Higgins <thigginsnbst@optonline.net>

1
Tom Higgins 516 674 4085

1/30/08 3:00

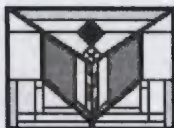
T-30 phone call to renegotiate
Velma + Tracy

we asked for an
additional 30
days

he asked for
an email

2:15

120



Tracy Lantz/DC/USEPA/US
01/30/2008 11:19 AM

To Tom Higgins <thigginsnbst@optonline.net>
cc Velma Noble/DC/USEPA/US
bcc
Subject Fw: Extension 83075-E Update

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Tracy Lantz/DC/USEPA/US
01/16/2008 09:57 AM

To Tom Higgins <thigginsnbst@optonline.net>
cc Velma Noble/DC/USEPA/US@EPA, Dennis
Edwards/DC/USEPA/US@EPA
Subject RE: Extension 83075-E Update

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You need to let me know as soon as you send us the information and by what means you are sending it
Once we receive it, I will likely be contacting you for the second renegotiation.

Tom Higgins <thigginsnbst@optonline.net>



Tom Higgins
<thigginsnbst@optonline.net>
>
01/16/2008 08:57 AM

To Tracy Lantz/DC/USEPA/US@EPA
cc Velma Noble/DC/USEPA/US@EPA, Dennis
Edwards/DC/USEPA/US@EPA, MDVDT@aol.com
Subject RE: Extension 83075-E Update

Tracy we had to speak to Chris Jiang to get clarification from him on the pre & post CSf forms. He was out Monday, we spoke to him yesterday, and we

He gave us the directions on how he suggested we reflect this on the pre & post CSF, which we have done, and which now will reflect the consistency to our label. We will be submitting the additional paper work later today after we run off the multiple copies of the guideline materials you need to cure the deficiencies, as stated in your 12/18 letter..

-----Original Message-----

From: Lantz.Tracy@epamail.epa.gov [mailto:Lantz.Tracy@epamail.epa.gov]
Sent: Tuesday, January 15, 2008 3:27 PM
To: Tom Higgins
Cc: Noble.Velma@epamail.epa.gov; Edwards.Dennis@epamail.epa.gov
Subject: Fw: Extension 83075-E Update

I have not heard from you as to whether you can confirm that this data was received by the Agency. As of today, 1/15/08, our records do not indicate that this information has been received. This renegotiation was based on your data arriving at the Agency on 1/9/08. If we do not receive your information in the next few days it is likely we will need to start the renegotiation process again to determine a revised Agency due date for your application.

Tracy
Lantz/DC/USEPA/U
S

01/11/2008 02:19
PM

Tom Higgins
<thigginsnbst@optonline.net>

To

cc

Subject
RE: Extension 83075-E Update
(Document link: Tracy Lantz)

Do you have confirmation that this information has been received by front end processing?
I do not see a note on my databases.
Please confirm status.

Tom Higgins
<thigginsnbst@op
tonline.net>

01/06/2008 03:07
PM

Tracy Lantz/DC/USEPA/US@EPA

MDVDT@aol.com

To

cc

Subject
RE: Extension 83075-E Update

Hi Tracy,

Just wanted to give you an update on when the paper work will be finished and re-submitted. We are expecting by 1/11/08 we will have it at the EPA.

-----Original Message-----

From: Lantz.Tracy@epamail.epa.gov [mailto:Lantz.Tracy@epamail.epa.gov]

Sent: Thursday, December 20, 2007 2:59 PM

To: Tom Higgins

Subject: Re: Extension 83075-E

Please send me a message that tells me when we can expect your additional information for Chemistry review.

Please be aware that this information needs to be formatted as per PR Notice 86-5 and if formatted as per this notice will be processed and receive MRIDs. You may contact Teresa Downs at (703) 305-5363 for further information on this formatting. If your studies are not formatted correctly, the studies will be found unacceptable by front end and additional time will be required to correct the studies.

In addition to the time necessary for this front end processing, the Agency will need 120 days to review this submission.

Please also indicate that you agree to a 120 day time extension in addition to the time required for the new information to reach the Agency.

It would be most helpful if you would send this reply e-mail to me as soon as possible.

Tom Higgins
<thigginsnbst@
ptonline.net>

12/20/2007
12:49 PM

Tracy Lantz/DC/USEPA/US@EPA

MDVDT@aol.com

Extension 83075-E

To

cc

Subject

Tracy,

I want to extend our application as I spoke to Chris Jiang this AM and he went through each of his findings and what he is seeking, which we are working on now, and hope to complete next week. It appears there is latitude by reviewer which permits them to ask for things that others do

not. So to accommodate these requests, we will send in a cover page addressing each of the "Findings" Chris listed, other than those that had been previously accepted, and reference the data requirement heading. At his suggestion we will be "Me-too" this application for labeling not chemistry as that will satisfy some of the ambiguities.

Lastly, can this email satisfy our request for an extension on #83075-E?
Or is there some other form or format that has to be executed?

Tom Higgins
President/CEO
NBS Technology LLC
516.674.4085 P
516.759.5309 F
516.592.2847 C
thigginsnbst@optonline.net
www.nbsgoldshield.com



Tom Higgins
<thigginsnbst@optonline.net>
01/25/2008 09:33 AM

To Tracy Lantz/DC/USEPA/US@EPA
cc Velma Noble/DC/USEPA/US@EPA, MDVDT@aol.com
bcc
Subject RE: Extension 83075-E

Hi Tracy,
Yesterday, Theresa suggested that we fax her copies of our application since you apparently were not in the office. We did that and she requested two pages to be added to the application, which we filled out and faxed back to her. She indicated she would contact you this AM regarding this matter, as she considers that the application now is properly formatted. If you would like I can still fax you copies of what was needed to be submitted, just let me know.

-----Original Message-----

From: Lantz.Tracy@epamail.epa.gov [mailto:Lantz.Tracy@epamail.epa.gov]
Sent: Thursday, January 24, 2008 3:52 PM
To: Tom Higgins
Cc: Noble.Velma@epamail.epa.gov
Subject: RE: Extension 83075-E

Please FAX the pages to me so that I can include them in the information you sent (since I currently have your new package) and then I will deliver it to Teresa so that she may determine if the studies are formatted correctly and may now receive MRIDs.
Please send them to me at the following number: 703 308 8481

Tom Higgins
<thigginsnbst@optonline.net>

01/24/2008
03:36 PM

To
Tracy Lantz/DC/USEPA/US@EPA
cc
Velma Noble/DC/USEPA/US@EPA,
Dennis Edwards/DC/USEPA/US@EPA,
MDVDT@aol.com
Subject
RE: Extension 83075-E

We have communicated with Theresa Downs, she gave us the page/form of "Claim of Confidentiality" that was required, we filled that out, faxed to her and she will add that to the application. I will be in my office all day tomorrow if you have any questions.

Thanks,
Tom Higgins

-----Original Message-----

From: Lantz.Tracy@epamail.epa.gov [mailto:Lantz.Tracy@epamail.epa.gov]
Sent: Wednesday, January 23, 2008 5:15 PM
To: Tom Higgins
Cc: Noble.Velma@epamail.epa.gov; Edwards.Dennis@epamail.epa.gov
Subject: Fw: Extension 83075-E

Today I received your reply to the deficiencies associated with this application.

I left a phone message at your office this afternoon summarizing the message below.

Chris Jiang, one of our chemists, and I have discussed your submission and found that it does not meet the formatting standards as per PR Notice 86-5 and will not receive MRIDs. As I previously stated (see message below dated 12/20/07), your information must be in 86-5 format to receive MRIDs and that the assignment of MRIDs is necessary for us to review your data. We have not reviewed your submission in detail and are unaware at this time if the submitted package will fulfill the data requirements necessary to register this product.

Please call Teresa Downs (as indicated in the message below) for an explanation of this formatting.

The information that was received (dated by you 1/15/08 and received by the Agency on 1/18/08) is unacceptable and this application must now be renegotiated for a second time. This is the final renegotiation which will be allowed for this product.

----- Forwarded by Tracy Lantz/DC/USEPA/US on 01/23/2008 05:03 PM -----

Tracy
Lantz/DC/USEPA/
US

12/20/2007
02:59 PM

Tom Higgins
<thigginsnbst@optonline.net>

To

cc

Subject

Re: Extension 83075-E(Document
link: Tracy Lantz)

Please send me a message that tells me when we can expect your additional information for Chemistry review.

Please be aware that this information needs to be formatted as per PR Notice 86-5 and if formatted as per this notice will be processed and receive MRIDs. You may contact Teresa Downs at (703) 305-5363 for further information on this formatting. If your studies are not formatted correctly, the studies will be found unacceptable by front end and additional time will be required to correct the studies.

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Tom Higgins
<thigginsnbst@optonline.net>

12/20/2007
12:49 PM

Tracy Lantz/DC/USEPA/US@EPA

MDVDT@aol.com

To

cc

Subject

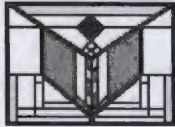
Extension 83075-E

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Tom Higgins
President/CEO
NBS Technology LLC
516.674.4085 P
516.759.5309 F
516.592.2847 C
thigginsnbst@optonline.net
www.nbsgoldshield.com



Tracy Lantz/DC/USEPA/US
01/23/2008 05:03 PM

To Tom Higgins <thigginsnbst@optonline.net>
cc Velma Noble/DC/USEPA/US, Dennis
Edwards/DC/USEPA/US
bcc
Subject Fw: Extension 83075-E

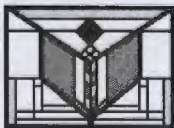
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Tracy Lantz/DC/USEPA/US
12/20/2007 02:59 PM

To Tom Higgins <thigginsnbst@optonline.net>
cc
Subject Re: Extension 83075-E

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Tom Higgins <thigginsnbst@optonline.net>



Tom Higgins
<thigginsnbst@optonline.net>
>
12/20/2007 12:49 PM

To Tracy Lantz/DC/USEPA/US@EPA
cc MDVDT@aol.com

Subject Extension 83075-E



Tracy,

I want to extend our application as I spoke to Chris Jiang this AM and he went through each of his findings and what he is seeking, which we are working on now, and hope to complete next week. It appears there is latitude by reviewer which permits them to ask for things that others do not. So to accommodate these requests, we will send in a cover page addressing each of the "Findings" Chris listed, other than those that had been previously accepted, and reference the data requirement heading. At his suggestion we will be "Me-too" this application for labeling not chemistry as that will satisfy some of the ambiguities.

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thigginsnbs@optonline.net
www.nbsgoldshield.com



Tom Higgins
<thigginsnbst@optonline.net>

01/16/2008 10:49 AM

To Tracy Lantz/DC/USEPA/US@EPA

cc Velma Noble/DC/USEPA/US@EPA, Dennis
Edwards/DC/USEPA/US@EPA, MDVDT@aol.com

bcc

Subject RE: Extension 83075-E Update

Tracy,

In all due respect, we are just trying to comply to what Chris requested, and we could only do that by reaching out to him, he was available yesterday. There was a misunderstanding of the chemistry and how it functions to be stabilized, and unless that is understood the corrections couldn't be made appropriately. When we explained to Chris [REDACTED], he

was able to recommend how he would like to see that reflected on the CSF forms, which is what we got straightened out yesterday. [REDACTED]

[REDACTED] and by understanding that he was able to recommend the format he would like to see. Once that was straightened out the rest is rather simple because it clears the deficiencies pointed out in you Dec 18th letter. My associate Ted had been in contact with the woman you recommended regarding the Guideline formats and number of copies needed, so we intend to send this out overnight tonight.

-----Original Message-----

From: Lantz.Tracy@epamail.epa.gov [mailto:Lantz.Tracy@epamail.epa.gov]

Sent: Wednesday, January 16, 2008 9:57 AM

To: Tom Higgins

Cc: Noble.Velma@epamail.epa.gov; Edwards.Dennis@epamail.epa.gov

Subject: RE: Extension 83075-E Update

You told us we would have this information in house by the 9th. You should be keeping me in the loop since there have been changes in the date that this material will arrive.

The real problem is that we will likely need to renegotiate this again due to your delay in sending in the requested information. The biggest problem with this is that each company is only allowed 2 renegotiations per submission. This would use up your second renegotiation which means if there are any other problems with the data, etc. our only option may be to issue a do not grant letter which means you would be required to start all over again and pay a new fee.

Are you planning to send this material by overnight delivery? You need to let me know as soon as you send us the information and by what means you are sending it. Once we receive it, I will likely be contacting you for the second renegotiation.

Tom Higgins
<thigginsnbst@optonline.net>

01/16/2008
08:57 AM

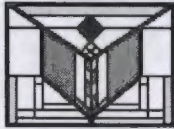
Tracy Lantz/DC/USEPA/US@EPA

Velma Noble/DC/USEPA/US@EPA,

To

cc

Manufacturing process information may be entitled to confidential treatment



Tracy Lantz/DC/USEPA/US

01/16/2008 09:50 AM

To Tom Higgins <thigginsnbst@optonline.net>

cc Velma Noble/DC/USEPA/US, Dennis
Edwards/DC/USEPA/US

bcc

Subject RE: Extension 83075-E Update

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Tom Higgins <thigginsnbst@optonline.net>



Tom Higgins

<thigginsnbst@optonline.net>

01/16/2008 08:57 AM

To Tracy Lantz/DC/USEPA/US@EPA

cc Velma Noble/DC/USEPA/US@EPA, Dennis
Edwards/DC/USEPA/US@EPA, MDVDT@aol.com

Subject RE: Extension 83075-E Update

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[REDACTED] He gave us the directions on how he suggested we reflect this on the pre & post CSF, which we have done, and which now will reflect the consistency to our label. We will be submitting the additional paper work later today after we run off the multiple copies of the guideline materials you need to cure the deficiencies, as stated in your 12/18 letter..

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Sent: Tuesday, January 15, 2008 3:27 PM

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Lantz/DC/USEPA/U
S
01/11/2008 02:19
PM

Tom Higgins
<thigginsnbst@optonline.net>
cc
Subject
RE: Extension 83075-E Update
(Document link: Tracy Lantz)

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<thigginsnbst@optonline.net>
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MDVDT@aol.com
Subject
RE: Extension 83075-E Update

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Tom Higgins
<thigginsnbst@
ptonline.net>

12/20/2007
12:49 PM

Tracy Lantz/DC/USEPA/US@EPA

MDVDT@aol.com

Extension 83075-E

To

cc

Subject

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516.674.4085 P

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516.592.2847 C
thigginsnbst@optonline.net
www.nbsgoldshield.com



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

January 25, 2008

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

NBS TECHNOLOGY, LLC
157 SKUNKS MISERY ROAD, PO Box 428
LOCUST VALLEY, NY 11560-

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 25-JAN-08. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

Receipt for Section 3



S: 823357

Resubmission: ☒ Yes ☐ No

Regulatory Type: Product Registration - Section 3

Fee For Service: ☐ Yes ☒ No

Application Type: New Registration

Billable: ☐ Yes ☒ No

Company: 83075 NBS TECHNOLOGY, LLC V

Print Letter

Enter More Information

Tracking

Risk Manager: Antimicrobials Division, Risk Management Team 31

Product #: 83075-E Product Name: GOLDSHIELD 75

Override#:

Me Too Section3: 70871-19 Me Too Product Name: BST PROTECTANT RTU 75

Application Date: 25-Jan-2008 ic

OPP Rec'd Date: 25-Jan-2008 ic

Front End Date: 25-Jan-2008 ic

Risk Manager Send Date: 25-Jan-2008 ic

FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Receipt Content

Study

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

resubmission following 86-5 rejection

New Ingredient Request Date:

New Ingredient Received Date:

Form A: ☐ Signature Date:

Form B: ☐ Signature Date:

NBS Technology, LLC

473284-00

157 Skunks Misery Rd.

P.O.Box 428

Locust Valley, New York 11560

thigginsnbst@optonline.net

516.674.4085P

516.759.5309 F

Jan. 15th, 2008

Document Processing Desk (RESUB)

Att: Velma Noble

Office of Pesticide Programs

Environmental Protection Agency

Washington, DC 20460

Re: **Request to cure deficiencies of EPA Findings dated Dec. 18, 2007**

47328401

OPP Decision Number D 378983

Product Name: Goldshield 75

EPA File Symbol: 83075-E

Application Date: April 20, 2007

For the purposes of this submission we will address only those deficiencies articulated in the Dec. 18, letter, which need to be cured and will follow the number sequence in your letter under "findings".

Attachments:

1. Attachment #7a. (CONFIDENTIAL ATTACHMENTS) Pre & Post Confidential Statements of Formulations
2. Attachment # 1; Form 8570-1, stating "similar to" & "me too" label not chemistry
3. Product Identity, 830.1550 Attachment #7b. (CONFIDENTIAL ATTACHMENTS)
4. Starting materials, 830.1600 Attachment #2
5. Description of formulation process, 830.1650, Attachment # 3
6. Formation of impurities, 830.1670, Attachment #4
7. Preliminary analysis; Attachment # 4a.
8. Certified limits calculations; Pre & Post CSF forms Attachment # 7a (CONFIDENTIAL ATTACHMENTS)
9. Enforcement analytical method, Attachment # 5
10. Sample availability statement, Attachment #5 a.
11. Curing of box 17 on CSF forms; Attachments 7a (CONFIDENTIAL ATTACHMENTS)
12. Form 8570-36 resubmission for clarity on viscosity Attachment #6

Sincerely,

Tom Higgins

Summary response to your Dec 18, 2007 letter.

FINDINGS:

1. The active ingredient on the Confidential Statement of Formula (CSF) (dated 8/17/07) is inconsistent with label.

Response: To cure this deficiency we have supplied "pre and post" CSF forms after consultation with Chris Jiang, Chemist EPA, [REDACTED]

[REDACTED] See enclosed Data Requirement of CONFIDENTIAL MATERIAL attachment # 7 a.

3. The registrant has submitted Form 8570-1 stating that the proposed formulation is identical to 70781-5; however, the proposed product is not identical to cited product.

Response: NBS has re-submitted form 8570-1 eliminating the word identical and states only "similar to". We are "me-too(ing)" the label not the chemistry. See attachment no #1

4. The product identity and composition is unacceptable because this requirement was not addressed. The registrant must read guideline 830.1550

Response: The active ingredient has been reflected in the Pre- and Post CSF forms. Reference MSDS sheets filed with the pre-registered product 83075-1. See enclosed data requirement of CONFIDENTIAL MATERIAL, attachment # 7.b.

5. The description of the starting materials is unacceptable because this requirement was not addressed. The registrant must read guideline 830.1600

Response: The starting materials are reflected in the new CSF forms and the Statement of formulation. See data requirement 830.1600 enclosed in Attachment no 2.

6. The description of the formulation process is unacceptable because this requirement was not addressed. The registrant must read guideline 830.1650.

Response: NBS has submitted the data requirement of the formulation process in the statement of formulation. [REDACTED]

[REDACTED] See attachment #3

7. The discussion of the formation of impurities is unacceptable because this requirement was not addressed. The registrant must read guidelines 830.1670.

Response: This manufacturing process is a simple mixing process, by blending registered ingredients, which result in no impurities. See attachment no #4.

2/21

8. The preliminary analysis is unacceptable because this requirement was not addressed. See data requirement enclosed.

Response: We are using registered sources of materials therefore this is not applicable.

9. The certified limits cannot be calculated because of the inconsistency between the CSF and label and because the data requirements that are not addressed in the submission.

Response: NBS has re-submitted pre and post CSF forms stating the above which provides a consistency with our labeling. See attachment no #7 a.

10. The enforcement analytical method is unacceptable. The method must be a thorough narrative detailing the list of materials used, the reagents used for assay (complete with normality and standardization procedures), instrumentation, sample preparation, how to prepare solutions, and the equation [percentage (weight by weight)] with each variable defined.

Response: As referenced to "Analytical method", the format and procedure were previously accepted by the EPA. See Attachment #5

11. The Submittal of samples is unacceptable as this requirement was not addresses in the submission. The registrant needs to state that samples are available upon request.

Response: Any and all samples are available upon request. 5Q.

13. Box 17 of the CSF is left blank.

Response: CSF forms have been cured and fixed. See CONFIDENTIAL MATERIALS attachment no. 7a.

21. The viscosity is unacceptable. The self-certification states that the viscosity of the liquid is less than 85.5 mPas; however the Agency needs a finite value. See attachment #6 form 8570-36

Response: The viscosity of Goldshield 75 is 6 centipoises using a Brookfield viscometer LVF model with spindle #2 at 60 rpm. Please see revised form 8570-36, see attachment #.6.

3/21

NBS Technology, LLC

157 Skunks Misery Rd.

P.O.Box 428

Locust Valley, New York 11560

thigginsnbst@optonline.net

516.674.4085P

516.759.5309 F

Missing for 80-5 format
- GLP
Statement
- data confidentiality
- signatures
etc.

Jan. 15th, 2008

Document Processing Desk (RESUB)

Att: Velma Noble

Office of Pesticide Programs

Environmental Protection Agency

Washington, DC 20460

Re: Request to cure deficiencies of EPA Findings dated Dec. 18, 2007

OPP Decision Number D 378983

Product Name: Goldshield 75

EPA File Symbol: 83075-E

Application Date: April 20, 2007

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1. Attachment #7a. (CONFIDENTIAL ATTACHMENTS) Pre & Post Confidential Statements of Formulations
2. Attachment # 1; Form 8570-1, stating "similar to" & "me too" label not chemistry
3. Product Identity, 830.1550 Attachment #7b. (CONFIDENTIAL ATTACHMENTS)
4. Starting materials, 830.1600 Attachment #2
5. Description of formulation process, 830.1650, Attachment # 3
6. Formation of impurities, 830.1670, Attachment #4
7. Preliminary analysis; Attachment # 4a.
8. Certified limits calculations; Pre & Post CSF forms Attachment # 7a (CONFIDENTIAL ATTACHMENTS)
9. Enforcement analytical method, Attachment # 5
10. Sample availability statement, Attachment #5 a.
11. Curing of box 17 on CSF forms; Attachments 7a (CONFIDENTIAL ATTACHMENTS)
12. Form 8570-36 resubmission for clarity on viscosity Attachment #6

Sincerely,

Tom Higgins



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Summary response to your Dec 18, 2007 letter.

FINDINGS:

1. The active ingredient on the Confidential Statement of Formula (CSF) (dated 8/17/07) is inconsistent with label.

Response: To cure this deficiency we have supplied "pre and post" CSF forms after consultation with Chris Jiang, Chemist EPA, [REDACTED]

[REDACTED]. See enclosed Data Requirement of CONFIDENTIAL MATERIAL attachment # 7 a.

3. The registrant has submitted Form 8570-1 stating that the proposed formulation is identical to 70781-5; however, the proposed product is not identical to cited product.

Response: NBS has re-submitted form 8570-1 eliminating the word identical and states only "similar to". We are "me-too(ing)" the label not the chemistry. See attachment no #1

4. The product identity and composition is unacceptable because this requirement was not addressed. The registrant must read guideline 830.1550

Response: The active ingredient has been reflected in the Pre- and Post CSF forms. Reference MSDS sheets filed with the pre-registered product 83075-1. See enclosed data requirement of CONFIDENTIAL MATERIAL, attachment # 7.b.

5. The description of the starting materials is unacceptable because this requirement was not addressed. The registrant must read guideline 830.1600

Response: The starting materials are reflected in the new CSF forms and the Statement of formulation. See data requirement 830.1600 enclosed in Attachment no 2.

6. The description of the formulation process is unacceptable because this requirement was not addressed. The registrant must read guideline 830.1650.

Response: NBS has submitted the data requirement of the formulation process in the statement of formulation. [REDACTED]

[REDACTED] See attachment #3

7. The discussion of the formation of impurities is unacceptable because this requirement was not addressed. The registrant must read guidelines 830.1670.

Response: This manufacturing process is a simple mixing process, by blending registered ingredients, which result in no impurities. See attachment no #4.

Manufacturing process information may be entitled to confidential treatment

8. The preliminary analysis is unacceptable because this requirement was not addressed. See data requirement enclosed.

Response: We are using registered sources of materials therefore this is not applicable.

9. The certified limits cannot be calculated because of the inconsistency between the CSF and label and because the data requirements that are not addressed in the submission.

Response: NBS has re-submitted pre and post CSF forms stating the above which provides a consistency with our labeling. See attachment no #7 a.

10. The enforcement analytical method is unacceptable. The method must be a thorough narrative detailing the list of materials used, the reagents used for assay (complete with normality and standardization procedures), instrumentation, sample preparation, how to prepare solutions, and the equation [percentage (weight by weight)] with each variable defined.

Response: As referenced to "Analytical method", the format and procedure were previously accepted by the EPA. See Attachment #5

11. The Submittal of samples is unacceptable as this requirement was not addresses in the submission. The registrant needs to state that samples are available upon request.

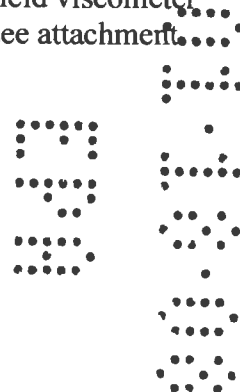
Response: Any and all samples are available upon request. *5 a*

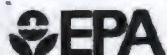
13. Box 17 of the CSF is left blank.

Response: CSF forms have been cured and fixed. See CONFIDENTIAL ,MATERIALS attachment no. *7a*

21. The viscosity is unacceptable. The self-certification states that the viscosity of the liquid is less than 85.5 mPas; however the Agency needs a finite value. See attachment #6 form 8570-36

Response: The viscosity of Goldshield 75 is 6 centipoises using a Brookfield viscometer LVF model with spindle #2 at 60 rpm. Please see revised form 8570-36, see attachment #*6*.





United States
Environmental Protection Agency
Washington, DC 20460

☒ Registration
☐ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number NBS Technology LLC/83075-E	2. EPA Product Manager 31 Velma Noble	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Goldshield 75	PM#	
5. Name and Address of Applicant (Include ZIP Code) NBS Technology LLC PO Box 428 157 Skunks Misery rd <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 70871-5(70871-19) <i>FORMERLY 75497-5</i> Product Name BSTI protectant RTU 75	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input checked="" type="checkbox"/> Resubmission in response to Agency letter dated _____	<input checked="" type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Me too application for label not chemistry

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container	<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 2,4,8,16,20,22,36g / 1.5, 220, 55 gallons <i>dam</i>		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Theodore Shlisky	Title COO	Telephone No. (Include Area Code) 516.674.4085
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature	3. Title COO	
4. Typed Name Theodore Shlisky	5. Date Jan15, 2008	



thigginsnbst@optonline.net

01/08/2008 12:16 PM

To Tracy Lantz/DC/USEPA/US@EPA

cc Velma Noble/DC/USEPA/US@EPA

bcc

Subject Re: 83075-E letter on 12/21

file in jacket

noted.

----- Original Message -----

From: Lantz.Tracy@epamail.epa.gov

Date: Tuesday, January 8, 2008 9:34 am

Subject: 83075-E letter on 12/21

To: Tom Higgins

Cc: Noble.Velma@epamail.epa.gov

> This letter was faxed from our office to you on 12/21 at 12:50
> PM. I
> have a receipt that it was received by your office.
>
> Please check your records as you will find that the FAX you received
> dated 12/21 matches the letter you received in the mail.
> The follow up in the mail was just a formality.
>
> The only action that is needed at this time is for you to submit the
> requested chemistry information which you have now indicated
> will arrive
> at the Agency on 1/11/08. No other confirmations are needed at this
> time.

> Tom Higgins

>
>>

> ptonline.net>

> To

> Tracy Lantz/DC/USEPA/US@EPA

>

> 01/07/2008

> cc

> 12:13 PM MDVDT@aol.com

>

>
> Subject
> Notification Letter
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>
> Please find attached a letter that will be sent registered mail
> to Ms.
> Velma Noble today along with our email correspondence to you, stating
> our intention to remedy the deficiencies in our application for
> ProductSymbol 83075-E. I suspect Velma's letter was intended to
> be sent prior
> to Dec. 31. It was actually sent Jan. 3rd 2008, it was received
> in our
> postal service Jan 7 ,2008.
>
> I would appreciate a returned email confirming your receipt of
> my letter
> and that you accept such as the proper and timely notification
> of our
> intention to remedy the deficiencies in our application.
> Thanking you
> in advance,
>
> Tom Higgins
> President/CEO
> NBS Technology LLC
> 516.674.4085 P
> 516.759.5309 F
> 516.592.2847 C
> thigginsnbst@optonline.net

> www.nbsgoldshield.com

> (See attached file: EPA letter to Ms. Noble 1.07.08..doc)



NBS Technology, LLC

157 Skunks Misery Rd.
P.O.Box 428
Locust Valley, New York 11560
thigginsnbs@optonline.net

516.674.4085P

516.759.5309 F

To: Ms. Velma Noble
From: Tom Higgins
Date: Jan. 7, 2008

Date: Jan. 7, 2008

Re: Your letter stamped Dec. 21, 2007 and recd via registered mail Jan. 7, 2008
Subject: Extension of Product Application Goldshield 75
EPA File Symbol: 83075-E

Dear Ms. Noble,

I suspect your letter was intended to be mailed on Dec 21, 2007 as that is the date it is stamped. In your letter you state that NBS must contact you before Dec. 31, 2007. Although we did not receive your letter until Jan. 7, 2008, which was post-marked Jan. 3, 2008 via "registered mail", we have corresponded to the EPA, via email to Ms. Tracy Lantz on Dec. 21, 2007 of our intention to extend and remedy the deficiencies (*please see enclosed email correspondence*) in our application.

Please confirm either in direct letter mail or email of your receipt of this letter confirming our intention to resubmit the materials and data identified as deficient, and that you accept the enclosed email correspondence to Tracy Lantz of meeting our obligations of notification to your agency of such.

Sincerely,

Thomas L. Higgins
President

Tom Higgins

From: Tom Higgins [thigginsnbst@optonline.net]
Sent: Thursday, December 20, 2007 12:50 PM
To: Lantz.Tracy@epamail.epa.gov
Cc: MDVDT@aol.com
Subject: Extension 83075-E

Tracy,

I want to extend our application as I spoke to Chris Jiang this AM and he went through each of his findings and what he is seeking, which we are working on now, and hope to complete next week. It appears there is latitude by reviewer which permits them to ask for things that others do not. So to accommodate these requests, we will send in a cover page addressing each of the "Findings" Chris listed, other than those that had been previously accepted, and reference the data requirement heading. At his suggestion we will be "Me-too" this application for labeling not chemistry as that will satisfy some of the ambiguities.

Lastly, can this email satisfy our request for an extension on #83075-E? Or is there some other form or format that has to be executed?

Tom Higgins
President/CEO
NBS Technology LLC
516.674.4085 P
516.759.5309 F
516.592.2847 C
thigginsnbst@optonline.net
www.nbsgoldshield.com

Tom Higgins

From: Tom Higgins [thigginsnbst@optonline.net]
Sent: Friday, December 21, 2007 2:42 PM
To: Lantz.Tracy@epamail.epa.gov
Cc: MDVDT@aol.com
Subject: Extension filing date

I have spoken with my people and we will address the deficiencies as described in your letter and with our conversations with Chris Jiang. We are planning on re-submitting the data and materials you need to cure the deficiencies of the original application on or about Jan. 9th. We reached out to Teresea Downs today , but she will not be back in the office until Dec. 27th. We intend to speak with her to insure all forms are submitted appropriately. Thank you and have a nice Holiday.

Tom Higgins
President/CEO
NBS Technology LLC
516.674.4085 P
516.759.5309 F
516.592.2847 C
thigginsnbst@optonline.net
www.nbsgoldshield.com

Tom Higgins

From: Tom Higgins [thigginsnbst@optonline.net]
Sent: Friday, December 21, 2007 2:47 PM
To: Lantz.Tracy@epamail.epa.gov
Cc: MDVDT@aol.com
Subject: FW: Extension filing date

Further to my earlier email, we understand and agree to the additional 120 days for your review process.

Tom Higgins.

From: Tom Higgins [mailto:thigginsnbst@optonline.net]
Sent: Friday, December 21, 2007 2:42 PM
To: Lantz.Tracy@epamail.epa.gov
Cc: MDVDT@aol.com
Subject: Extension filing date

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516.592.2847 C
thigginsnbst@optonline.net
www.nbsgoldshield.com

Tom Higgins

From: Tom Higgins [thigginsnbst@optonline.net]
Sent: Sunday, January 06, 2008 3:07 PM
To: 'Lantz.Tracy@epamail.epa.gov'
Cc: MDVDT@aol.com
Subject: RE: Extension 83075-E Update

Hi Tracy,

Just wanted to give you an update on when the paper work will be finished and re-submitted. We are expecting by 1/11/08 we will have it at the EPA.

-----Original Message-----

From: Lantz.Tracy@epamail.epa.gov [mailto:Lantz.Tracy@epamail.epa.gov]
Sent: Thursday, December 20, 2007 2:59 PM
To: Tom Higgins
Subject: Re: Extension 83075-E

Please send me a message that tells me when we can expect your additional information for Chemistry review.

Please be aware that this information needs to be formatted as per PR Notice 86-5 and if formatted as per this notice will be processed and receive MRIDs. You may contact Teresa Downs at (703) 305-5363 for further information on this formatting. If your studies are not formatted correctly, the studies will be found unacceptable by front end and additional time will be required to correct the studies.

In addition to the time necessary for this front end processing, the Agency will need 120 days to review this submission.

Please also indicate that you agree to a 120 day time extension in addition to the time required for the new information to reach the Agency.

It would be most helpful if you would send this reply e-mail to me as soon as possible.

Tom Higgins
<thigginsnbst@optonline.net>

12/20/2007
12:49 PM

Tracy Lantz/DC/USEPA/US@EPA

MDVDT@aol.com

Extension 83075-E

To

cc

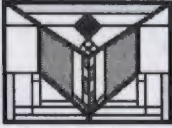
Subject

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Lastly, can this email satisfy our request for an extension on #83075-E?
Or is there some other form or format that has to be executed?

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NBS Technology LLC
516.674.4085 P
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516.592.2847 C
thigginsnbs@optonline.net
www.nbsgoldshield.com



Tracy Lantz/DC/USEPA/US
01/08/2008 10:25 AM

To Tom Higgins <thigginsnbst@optonline.net>
cc Velma Noble/DC/USEPA/US
bcc
Subject Re: Notification Letter

This letter was faxed from our office to you on 12/21 at 12:50 PM. I have a receipt that it was received by your office.

Please check your records as you will find that the FAX you received dated 12/21 matches the letter you received in the mail.

The follow up in the mail was just a formality.

The only action that is needed at this time is for you to submit the requested chemistry information which you have now indicated will arrive at the Agency on 1/11/08. No other confirmations are needed at this time.

Tom Higgins <thigginsnbst@optonline.net>



Tom Higgins
<thigginsnbst@optonline.net>
01/07/2008 12:13 PM

To Tracy Lantz/DC/USEPA/US@EPA
cc MDVDT@aol.com
Subject Notification Letter

Please find attached a letter that will be sent registered mail to Ms. Velma Noble today along with our email correspondence to you, stating our intention to remedy the deficiencies in our application for Product Symbol 83075-E. I suspect Velma's letter was intended to be sent prior to Dec. 31. It was actually sent Jan. 3rd 2008, it was received in our postal service Jan 7, 2008.

I would appreciate a returned email confirming your receipt of my letter and that you accept such as the proper and timely notification of our intention to remedy the deficiencies in our application.

Thanking you in advance,

Tom Higgins
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www.nbsgoldshield.com



EPA letter to Ms. Noble 1.07.08..doc



Tom Higgins
<thigginsnbst@optonline.net>

01/07/2008 12:13 PM

To Tracy Lantz/DC/USEPA/US@EPA

cc MDVDT@aol.com

bcc

Subject Notification Letter

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EPA letter to Ms. Noble 1.07.08..doc

check file in
office - I believe
he rec'd this
letter by fax on
12/21/07.



NBS Technology, LLC
157 Skunks Misery Rd.
P.O.Box 428
Locust Valley, New York 11560
thigginsnbs@optonline.net

516.674.4085P

516.759.5309 F

To: Ms. Velma Noble
From: Tom Higgins
Date: Jan. 7, 2008

Date: Jan. 7, 2008

Re: Your letter stamped Dec. 21, 2007 and recd via registered mail Jan. 7, 2008
Subject: Extension of Product Application Goldshield 75
EPA File Symbol: 83075-E

Dear Ms. Noble,

I suspect your letter was intended to be mailed on Dec 21, 2007 as that is the date it is stamped. In your letter you state that NBS must contact you before Dec. 31, 2007. Although we did not receive your letter until Jan. 7, 2008, which was post-marked Jan. 3, 2008 via "registered mail", we have corresponded to the EPA, via email to Ms. Tracy Lantz on Dec. 21, 2007 of our intention to extend and remedy the deficiencies (*please see enclosed email correspondence*) in our application.

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Sincerely,

Thomas L. Higgins
President



Tom Higgins
<thigginsnbst@optonline.net>

01/06/2008 03:07 PM

To Tracy Lantz/DC/USEPA/US@EPA

cc MDVDT@aol.com

bcc

Subject RE: Extension 83075-E Update

file -
note new
date.

Hi Tracy,

Just wanted to give you an update on when the paper work will be finished and re-submitted. We are expecting by 1/11/08 we will have it at the EPA.

-----Original Message-----

From: Lantz.Tracy@epamail.epa.gov [mailto:Lantz.Tracy@epamail.epa.gov]

Sent: Thursday, December 20, 2007 2:59 PM

To: Tom Higgins

Subject: Re: Extension 83075-E

originally negotiated based on 1/9/08

Please send me a message that tells me when we can expect your additional information for Chemistry review.

Please be aware that this information needs to be formatted as per PR Notice 86-5 and if formatted as per this notice will be processed and receive MRIDs. You may contact Teresa Downs at (703) 305-5363 for further information on this formatting. If your studies are not formatted correctly, the studies will be found unacceptable by front end and additional time will be required to correct the studies.

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Tom Higgins
<thigginsnbst@optonline.net>

12/20/2007
12:49 PM

To Tracy Lantz/DC/USEPA/US@EPA

cc MDVDT@aol.com

Subject Extension 83075-E

To

cc

Subject

Tracy,

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Or is there some other form or format that has to be executed?

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516.759.5309 F
516.592.2847 C
thigginsnbs@optonline.net
www.nbsgoldshield.com



Tom Higgins
<thigginsnbst@optonline.net>

01/06/2008 03:07 PM

To Tracy Lantz/DC/USEPA/US@EPA

cc MDVDT@aol.com

bcc

Subject RE: Extension 83075-E Update

History:

✉ This message has been replied to.

Hi Tracy,

Just wanted to give you an update on when the paper work will be finished and re-submitted. We are expecting by 1/11/08 we will have it at the EPA.

-----Original Message-----

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Sent: Thursday, December 20, 2007 2:59 PM

To: Tom Higgins

Subject: Re: Extension 83075-E

first sent

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Tom Higgins
<thigginsnbst@optonline.net>

12/20/2007
12:49 PM

To Tracy Lantz/DC/USEPA/US@EPA

cc MDVDT@aol.com

Subject Extension 83075-E

To

cc

Subject

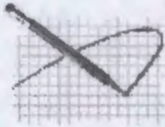
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516.592.2847 C
thigginsnbs@optonline.net
www.nbsgoldshield.com

83075-E



Pesticide Registration
Improvement Act
Sent by: DCOPPAPPS01

12/31/2007 04:09 PM

Please respond to
Pesticide
Registration@epamail.epa.gov

To lantz.tracy@epa.gov

cc

bcc

Subject Email Notification of Negotiated Due Date


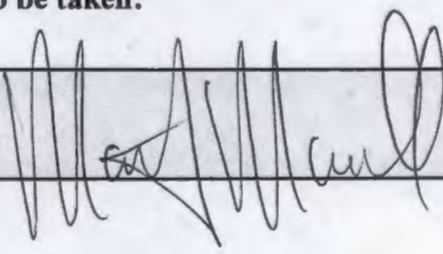
SUBJECT: Notification -- Due Date for Decision #378983 has been re-negotiated

Please note: The PRIA Due Date for the following decision has been negotiated:

Decision Number: 378983
Original Due Date: 01/10/2008
Negotiated Due Date: 05/10/2008
You are a Reviewer assigned to a data package for this decision

This is an automatically generated notification message. Please do not reply to this address.

**Recommendation of Division Directors
Negotiated Due Dates**

Decision#: D378983		Registration#: 83075-E		Petition #:	
Fee Category: A54			PRIA Decision Time Frame: 120 days		
Submitted by: Velma Noble/Tracy Lantz			Branch: RMBI		Date: 12/21/07
Company: NBS Technologies					
Original Due Date: 1/10/08			Proposed New Due Date: 5/10/08		
Previous Negotiated Due Dates: none					
Is the "Fix" in-house? No			If not, date "Fix" expected: 1/9/08		
Issue (describe in detail): Registrant has submitted unacceptable product chemistry data. Additional information is necessary to meet Agency guidelines including product identity and composition, starting materials, formation process including impurities, preliminary analysis and enforcement analytical method.					
Summary of Deficiency Type(s): Not Submitted (N) Deficiencies (D) Product Chemistry: <u> D </u> Acute Tox: <u> </u> Efficacy: <u> </u> Labeling: <u> </u> Other (describe): <u> </u>					
Describe Interactions with Company (describe when contacted and company's response including response to previous negotiated due dates): The chemistry review was faxed to and discussed with the registrant on 12/18, 12/19, and 12/20. Registrant will submit additional information to address these chemistry deficiencies.					
"75 Day" Letter sent? <u> X </u> 12/21/07 (Date sent) Yes <u> </u> No and reason for none?					
Rationale for Proposed Due Date: This data will be placed back into review, thus we need to allow 90 days for the chemistry review and 30 days for the administrative/regulatory review.					
Registrant notified that this is the last negotiation? <u> </u> Yes <u> X </u> Not Applicable 1 st Negotiation					
Approve: 			Disapprove:		
If disapproved, action to be taken:					
OD or DOD Signature: 				Date: 12-28-07	



Tom Higgins
<thigginsnbst@optonline.net>

12/21/2007 02:46 PM

To Tracy Lantz/DC/USEPA/US@EPA

cc MDVDT@aol.com

bcc

Subject FW: Extension filing date

Further to my earlier email, we understand and agree to the additional 120 days for your review process.

Tom Higgins.

From: Tom Higgins [mailto:thigginsnbst@optonline.net]

Sent: Friday, December 21, 2007 2:42 PM

To: Lantz.Tracy@epamail.epa.gov

Cc: MDVDT@aol.com

Subject: Extension filing date

I have spoken with my people and we will address the deficiencies as described in your letter and with our conversations with Chris Jiang. We are planning on re-submitting the data and materials you need to cure the deficiencies of the original application on or about Jan. 9th. We reached out to Teresea Downs today, but she will not be back in the office until Dec. 27th. We intend to speak with her to insure all forms are submitted appropriately. Thank you and have a nice Holiday.

Tom Higgins

President/CEO

NBS Technology LLC

516.674.4085 P

516.759.5309 F

516.592.2847 C

thigginsnbst@optonline.net

www.nbsgoldshield.com



Tom Higgins
<thigginsnbst@optonline.net>

12/21/2007 02:42 PM

To Tracy Lantz/DC/USEPA/US@EPA

cc MDVDT@aol.com

bcc

Subject Extension filing date

I have spoken with my people and we will address the deficiencies as described in your letter and with our conversations with Chris Jiang. We are planning on re-submitting the data and materials you need to cure the deficiencies of the original application on or about Jan. 9th. We reached out to Teresea Downs today, but she will not be back in the office until Dec. 27th. We intend to speak with her to insure all forms are submitted appropriately. Thank you and have a nice Holiday.

Tom Higgins
President/CEO
NBS Technology LLC
516.674.4085 P
516.759.5309 F
516.592.2847 C
thigginsnbst@optonline.net
www.nbsgoldshield.com



United States Environmental Protection Agency
Washington, D.C. 20460

Office of Prevention, Pesticides and Toxic Substances
Office of Pesticides Programs
Antimicrobial Division

FAX NUMBER (703)

FACSIMILE REQUEST/COVER SHEET
(Please type or print clearly in black ink only)

SEND FAX TO:

Name: Tom Higgins

Office: NBS

FAX phone No. 516 759 5309

Office Phone: 516 674 4085

FROM:

Name: Tracy Lantz

Division/Branch: AD

Office Phone No: 703 308 6415

Mail Code: 7510P

Date: 12/21/07

Time: 12:50 PM

Number of pages (with this cover sheet): 8

Special Message:

83075-E letter regarding
this weeks discussions.

*** TX REPORT ***

TRANSMISSION OK

TX/RX NO	1779	
CONNECTION TEL		915167595309
SUBADDRESS		
CONNECTION ID		
ST. TIME	12/21 13:37	
USAGE T	02'19	
PGS.	8	
RESULT	OK	



United States Environmental Protection Agency
Washington, D.C. 20460

Office of Prevention, Pesticides and Toxic Substances
Office of Pesticides Programs
Antimicrobial Division

FAX NUMBER (703)

FACSIMILE REQUEST/COVER SHEET
(Please type or print clearly in black ink only)

SEND FAX TO:Name: Tom HigginsOffice: NBSFAX phone No. 516 759 5309Office Phone: 516 674 4085**FROM:**Name: Tracy LantzDivision/Branch: ADOffice Phone No: 703 308 6415Mail Code: 7510PDate: 12/21/07Time: 12:50 PMNumber of pages (with this cover sheet): 8

Special Message:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DEC 21 2007

OPP Decision Number D 378983

Tom Higgins
President/CEO NBS Technologies
P.O. Box 428
157 Skunks Misery Road
Locust Valley, NY 11560

Subject: Application for Registration
Product Name: Goldshield 75
EPA File Symbol: 83075-E
Application Date: April 20, 2007
EPA Receipt Date: May 1, 2007

Dear Mr. Higgins:

Our records indicate that the decision review period for EPA to make a determination regarding the above referenced application ends on January 10, 2008 as pursuant to the Pesticide Registration Improvement Act (PRIA). The application has been determined, pursuant to 40 CFR 152.105, not to be sufficiently complete to process; therefore, the application is considered deficient. You are permitted 75 days to respond to these deficiencies before the Agency withdraws your application. Since the PRIA clock expires before 75 days from the date of this letter, you must contact the Agency by December 31, 2007 to explain how you will address the deficiencies along with a mutually agreed upon renegotiated PRIA due date or receive a determination not to grant your application.

The Agency first conveyed these deficiencies to you in a phone conversation and via FAX on 12/18/07. Further discussion of these deficiencies occurred on 12/19/07 with Dennis Edwards and on 12/20/07 with representatives from your company and Chris Jiang.

If, after 75 days from the date of this letter, you do not respond, or you subsequently fail to complete the application within the time scheduled for completion,

CONCURRENCES							
SYMBOL	J510P						
SURNAME	J. Jiang						
DATE	12/21/07						

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

the Agency will terminate any action on the application, and will treat the application as if it has been withdrawn by the applicant. This action would result in your submission being removed from the provisions of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and PRIA. Any subsequent submission relating to the application must be submitted as a new PRIA application and subject to fees.

Address the following deficiencies:

1. The product identity and composition is **unacceptable** as this requirement was not addressed. Please refer to guideline 830.1550.
2. The description of the starting materials is **unacceptable** as this requirement was not addressed. Please refer to guideline 830.1600.
3. The description of the formation process is **unacceptable** as this requirement was not addressed. Please refer to guideline 830.1650.
4. The discussion of the formation of impurities is **unacceptable** as this requirement was not addressed. Please refer to guideline 830.1670.
5. The preliminary analysis is **unacceptable** as this requirement was not addressed.
6. The certified limits cannot be calculated because of the inconsistency between the CSF and label and because of the data requirements that are not addressed in the submission.
7. The enforcement analytical method is **unacceptable**. The method must be a thorough narrative detailing the list of materials used, the reagents used for assay (complete with normality and standardization procedures), instrumentation, sample preparation, how to prepare solutions, and the equation [percentage (weight by weight)] with each variable defined.
8. The registrant needs to provide clearly labeled pre- and post-reaction CSFs. (See confidential appendix.).
9. Box 17 of the CSF is left blank. Provide the required information.
10. The viscosity is **unacceptable**. The self-certification states that viscosity of the liquid is less than 85.5 mPas; however, the Agency requires a finite value.

This information, other than the required Confidential Statement of Formula form, must be submitted in compliance with PR Notice 86-5.

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

These deficiencies must be corrected before the Agency can proceed further with this application. You are urged to contact the Agency by December 31, 2007 and commit to a schedule to resolve the deficiencies including your proposed re-negotiated due date for this PRIA action.

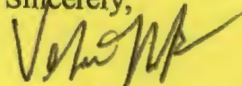
You have the following two options.

1. **Resolve the issue(s).** You may resolve the issue identified in this letter by submitting replying to the Agency by December 31, 2007 with information as to when you will be able to address the deficiencies. Please include your proposed re-negotiated PRIA due date and the date you expect to submit the fix at this time. Your re-negotiated PRIA due date must include the date that you expect to submit the fix plus an additional 120-days for Agency review. If no other issues arise as a result of your response to this letter, and the information is found to be acceptable, it is the Agency's expectation that resolution of the deficiencies will result in the granting of your application.

2. **Do nothing.** If you do not respond to this letter by December 31, 2007, or if you do not wish to re-negotiate the PRIA deadline, the Agency will issue a determination not to grant your application. A determination not to grant your application would remove your application from the provisions of PRIA. Subsequent re-submissions would require a new PRIA application and fee. Because this determination is not a denial under section 3(c) (6) of FIFRA, you may request that EPA issue a formal denial under procedures outlined in section 3(c) (6) of FIFRA and 40 CFR § 152.118. The process includes publication of a notice of denial in the Federal Register and a possible public hearing. If the request for a formal denial is not received 75 days from the date of this letter, the Agency will administratively withdraw the submission pursuant to 40 CFR 152.105.

If you have questions concerning this letter, please contact Tracy Lantz by telephone, (703) 308-6415, or by e-mail at Lantz.tracy@epa.gov.

Sincerely,



Velma Noble
Product Manager (31)
Regulatory Management Branch I
Antimicrobials Division (7510P)

7510P: T.Lantz:12/21/07:83075-E
Enclosure: DER D343751

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

171

DATA PACKAGE BEAN SHEET

Date: 10-Sep-2007

Page 1 of 2

Decision #: 378983

DP #: (343751)

PRIA

Parent DP#:

*** Registration Information ***

Registration: 83075-E - GOLDSHIELD 75

Company: 83075 - NBS TECHNOLOGY, LLC

Risk Manager: RM 31 - Velma Noble - (703) 308-6233 Room# PY1 S-8855

Risk Manager Reviewer: Tracy Lantz TLANTZ

Sent Date: _____

Calculated Due Date: 10-Sep-2007

11/1/07

Edited Due Date: _____

Type of Registration: Product Registration - Section 3

Action Desc: (A54) NEW PRODUCT;NON-FAST TRACK;FIFRA SEC. 2(MM) USES;

Ingredients: _____

PRIA

*** Data Package Information ***

Expedite: ☐ Yes ☒ No

Date Sent: 10-Sep-2007

Due Back: _____

DP Ingredient: _____

DP Title: _____

CSF Included: ☒ Yes ☐ No

Label Included: ☒ Yes ☐ No

Parent DP #: _____

Assigned To

Date In

Date Out

Organization: AD / PSB

9/11/07

12/17/07

Last Possible Science Due Date: 20-Aug-2007

Team Name: CTT

9/11/07

12/17/07

Science Due Date: 10/26/11/20/07

Reviewer Name: Chrisd

9/13/07

12/15/07

Sub Data Package Due Date: 12/10/07

Contractor Name: _____

*** Studies Sent for Review ***

Printed on Page 2

*** Additional Data Package for this Decision ***

No Additional Data Packages

*** Data Package Instructions ***

Please review product Chemistry + CSF. Have submitted self certification, Analytical Method MRID: 471974-01. They are citing product chemistry from (70971-19 (was 70871S)). Both CSFs included. Clock should start in a few days.

120
90

DATA PACKAGE BEAN SHEET

Date: 02-Oct-2007

Page 1 of 3

Decision #: 378983

DP #: (343751)

PRIA

Parent DP#:

*** Registration Information ***

Registration: 83075-E - GOLDSHIELD 75

Company: 83075 - NBS TECHNOLOGY, LLC

Risk Manager: RM 31 - Velma Noble - (703) 308-6233 Room# PY1 S-8855

Risk Manager Reviewer: Tracy Lantz TLANTZ

Sent Date: _____

Calculated Due Date: 10-Jan-2008

Edited Due Date: _____

Type of Registration: Product Registration - Section 3

Action Desc: (A54) NEW PRODUCT;NON-FAST TRACK;FIFRA SEC. 2(MM) USES;

Ingredients: _____

*** Data Package Information ***

Expedite: ☐ Yes ☒ No

Date Sent: 10-Sep-2007

Due Back: _____

DP Ingredient: _____

DP Title: _____

CSF Included: ☒ Yes ☐ No

Label Included: ☒ Yes ☐ No

Parent DP #: _____

Assigned To

Date In

Date Out

Organization: AD / PSB

11-Sep-2007

Last Possible Science Due Date: 11-Dec-2007

Team Name: CTT

11-Sep-2007

Science Due Date: 10-Dec-2007

Reviewer Name: Jiang, Chris

14-Sep-2007

Sub Data Package Due Date: 10-Dec-2007

Contractor Name: _____

*** Studies Sent for Review ***

Printed on Page 2

*** Additional Data Package for this Decision ***

Printed on Page 3

*** Data Package Instructions ***

Please review product chemistry + CSF. Have submitted self certification, Analytical Method MRID: 471974-01. They are citing product chemistry from 70971-19 (was 70871S). Both CSFs included. Clock should start in a few days.

TASK ASSIGNMENT FORM
Antimicrobial Division/Regulatory Management Branch II

A	Completed by Product Manager						
PRODUCT REVIEWER: <u>Tracy Lantz</u>					RMB <u>I</u> TEAM <u>31</u>		
Description of Action: <u>Registration of new product</u>					EPA File Symbol/Reg No. <u>83075-E</u>		
Decision No. <u>D 378983</u>		Submission No. <u>S 809596</u>		Fee for Service Action Code: <u>A54</u>			
FQPA Action Code: _____		Non-FQPA Action Code: _____		Fee for Service Fee: \$ <u>4200</u>			
	MONTH	DAY	YEAR				
APPLICATION DATE	4	20	2005 2007				
EPA PIN DATE	8	21	2005 2007				
REVIEWER ASSIGNED DATE	9	5	2005 2007				
DATE DUE FROM SCIENCE	12	1	2005 2007				
DATE DUE TO PM	1	1	2005 2008				
Type of Data:	PSB Product Chemistry <input checked="" type="checkbox"/>	PSB Acute Toxicology <input type="checkbox"/>	PSB Efficacy <input type="checkbox"/>	RASSB Environmental Fate <input type="checkbox"/>	RASSB Ecological Effects <input type="checkbox"/>	RASSB Chronic Toxicology <input type="checkbox"/>	RASSB Exposure <input type="checkbox"/>
<p>COMMENTS: NOTE TO ARCTIC SLOPE - PLEASE COMPLETE PART B OF FORM.</p> <p>Karen: Please review product chemistry + CSF. Have submitted Self Certification, Analytical Method MRID: 471974-01. They are citing product chemistry from 70871-19 (was 70871-5). Both CSFs included. Clock should start in a few days.</p>							
<p>ATTACHMENTS: <input checked="" type="checkbox"/> LABELING <input checked="" type="checkbox"/> CSF(S) <input checked="" type="checkbox"/> DATA <input type="checkbox"/> OTHERS</p>							
B	For Arctic Slope Contract Only						
Contractor: Arctic Slope				Contract No.: 0332		ARCTIC SLOPE/MANAGER	
Draft Task: Signature _____ (Est. hrs)				Final Task: Signature _____ (Total hrs)			
C	Reviewer's Comments:						
DATE FEE PAID: _____				RESPONSE CODE: _____		RESPONSE DATE <u>174</u>	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION,
PESTICIDES
AND TOXIC
SUBSTANCES

December 15, 2007

MEMORANDUM

Subject: Review for 83075-E

DP 343751

From: Chris Jiang, Chemist
Chemistry and Toxicology Team
Product Science Branch
Antimicrobials Division (7510P)

Chris Jiang

Thru: *for* Karen P. Hicks, CT Team Leader
Chemistry and Toxicology Team
Product Science Branch
Antimicrobials Division (7510P)

Michele E. Wingfield

Thru: Michele E. Wingfield, Chief
Product Science Branch
Antimicrobials Division (7510P)

To: Velma Noble PM 31\Tracy Lantz
Regulatory Management Branch I
Antimicrobials Division (7510P)

Applicant: NBS Technology, LLC

Formulation from Label

<u>Active Ingredient(s)</u>	<u>% by wt.</u>
3-(Trihydroxysilyl)propyldimethyloctadecyl ammonium chloride	0.75 %
<u>Other Ingredients</u>	99.25 %
Total	100.0 %

BACKGROUND:

The registrant has submitted a product chemistry package in support of a new registration for a microbiostatic agent. The package includes a label, a Confidential Statement of Formula, a self-certification for physical/chemical characteristics, and a study that has been identified by the Agency as MRID 47197401.

FINDINGS:

1. The active ingredient on the Confidential Statement of Formula (CSF dated 8/17/07) is inconsistent with the label declaration.
2. All ingredients are cleared for use in pesticidal formulations.
3. The registrant has submitted Form 8570-1 stating that the proposed formulation is identical to 70781-5; however, the proposed product is not identical to the cited product.
4. The product identity and composition is **unacceptable** because this requirement was not addressed. The registrant must read guideline 830.1550.
5. The description of the starting materials is **unacceptable** because this requirement was not addressed. The registrant must read guideline 830.1600.
6. The description of the formation process is **unacceptable** because this requirement was not addressed. The registrant must read guideline 830.1650.
7. The discussion of the formation of impurities is **unacceptable** because this requirement was not addressed. The registrant must read guideline 830.1670.
8. The preliminary analysis is **unacceptable** because this requirement was not addressed.
9. The certified limits cannot be calculated because of the inconsistency between the CSF and label and because of the data requirements that are not addressed in the submission.
10. The enforcement analytical method is **unacceptable**. The method must be a thorough narrative detailing the list of materials used, the reagents used for assay (complete with normality and standardization procedures), instrumentation, sample preparation, how to prepare solutions, and the equation [percentage (weight by weight)] with each variable defined.
11. The submittal of samples is **unacceptable** as this requirement was not addressed in the submission. The registrant needs to state that samples are available upon request.

12. The registrant needs to provide clearly labeled pre- and post-reaction CSFs. (See confidential appendix.)
13. Box 17 of the CSF is left blank.
14. The color, physical state, and odor are **acceptable** as the product is an odorless pale yellow to off-white liquid.
15. The density is **acceptable** as the density was determined to be 8.3 lbs/gal..
16. The pH is **acceptable** as the pH was determined to be 5.17.
17. The oxidation/reduction potential is **acceptable** as this requirement is not applicable to the product.
18. The flammability is **acceptable** as the product is non-flammable.
19. The explodability is **acceptable** as the product does not contain any explosive material.
20. The joint study for storage stability and corrosion characteristics is ongoing.
21. The viscosity is **unacceptable**. The self-certification states that viscosity of the liquid is less than 85.5 mPas; however, the Agency needs a finite value.
22. The miscibility is **acceptable** as the product is dispersible in water.
23. The dielectric breakdown voltage is **acceptable** as the product is not intended for use around electrical equipment.

CONCLUSIONS:

Product Science Branch of Antimicrobials Division finds the submission for 83075-E to be unacceptable for the reasons discussed in the finding. The registrant must correct the issues discussed in the findings for registration to proceed.

CONFIDENTIAL APPENDIX

1. [REDACTED]



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION,
PESTICIDES
AND POLICE
SUBSTANCES

December 15 2007

DP BARCODE: D343751

MRID: 47197401

SUBJECT: Goldshield 75

REG. NO. OR FILE SYMBOL: 83075-E

DOCUMENT TYPE: Product Chemistry Review

Manufacturing-use [] OR End-use Product [X]

INGREDIENTS (PC Codes): 107403

CAS Number: 199111-50-7

TEST LAB: N/A

SUBMITTER: NBS Technology, LLC

GUIDELINE: 830 Guidelines

COMMODITIES: Formulation

REVIEWER: Chris Jiang (C)

ORGANIZATION: AD

APPROVER: Karen P. Hicks

APPROVED DATE: 12/17/07

COMMENT:



Tracy Lantz/DC/USEPA/US
12/20/2007 02:26 PM

To Tom Higgins <thigginsnbst@optonline.net>
cc
bcc
Subject Re: Extension 83075-E

Please send me a message that tells me when we can expect your additional information for Chemistry review.

Please be aware that this information needs to be formatted as per PR Notice 86-5 and if formatted as per this notice will be processed and receive MRIDs. You may contact Teresa Downs at (703) 305-5363 for further information on this formatting. If your studies are not formatted correctly, the studies will be found unacceptable by front end and additional time will be required to correct the studies.

In addition to the time necessary for this front end processing, the Agency will need 120 days to review this submission.

Please also indicate that you agree to a 120 day time extension in addition to the time required for the new information to reach the Agency.

It would be most helpful if you would send this reply e-mail to me as soon as possible.

Tom Higgins <thigginsnbst@optonline.net>



Tom Higgins
<thigginsnbst@optonline.net>
>
12/20/2007 12:49 PM

To Tracy Lantz/DC/USEPA/US@EPA
cc MDVDT@aol.com
Subject Extension 83075-E

Tracy,

I want to extend our application as I spoke to Chris Jiang this AM and he went through each of his findings and what he is seeking, which we are working on now, and hope to complete next week. It appears there is latitude by reviewer which permits them to ask for things that others do not. So to accommodate these requests, we will send in a cover page addressing each of the "Findings" Chris listed, other than those that had been previously accepted, and reference the data requirement heading. At his suggestion we will be "Me-too" this application for labeling not chemistry as that will satisfy some of the ambiguities.

Lastly, can this email satisfy our request for an extension on #83075-E? Or is there some other form or format that has to be executed?

Tom Higgins
President/CEO
NBS Technology LLC
516.674.4085 P
516.759.5309 F

516.592.2847 C
thigginsnbst@optonline.net
www.nbsgoldshield.com



Tom Higgins
<thigginsnbst@optonline.net>

12/20/2007 12:49 PM

To Tracy Lantz/DC/USEPA/US@EPA
cc MDVDT@aol.com
bcc
Subject Extension 83075-E

Tracy,

I want to extend our application as I spoke to Chris Jiang this AM and he went through each of his findings and what he is seeking, which we are working on now, and hope to complete next week. It appears there is latitude by reviewer which permits them to ask for things that others do not. So to accommodate these requests, we will send in a cover page addressing each of the "Findings" Chris listed, other than those that had been previously accepted, and reference the data requirement heading. At his suggestion we will be "Me-too" this application for labeling not chemistry as that will satisfy some of the ambiguities.

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Tom Higgins
President/CEO
NBS Technology LLC
516.674.4085 P
516.759.5309 F
516.592.2847 C
thigginsnbst@optonline.net
www.nbsgoldshield.com



Tracy Lantz/DC/USEPA/US
12/18/2007 02:49 PM

To Tom Higgins <thigginsnbst@optonline.net>
cc
bcc
Subject RE: 83075-E Payment

Are you available for us to call you at about 4:15 eastern time today??
Tom Higgins <thigginsnbst@optonline.net>

12/18/07
Phoned Tom Higgins (Tracy + Dennis)
regarding unacceptable
chemistry data



Tom Higgins
<thigginsnbst@optonline.net>

10/03/2007 08:41 AM

To Tracy Lantz/DC/USEPA/US@EPA
cc Velma Noble/DC/USEPA/US@EPA
Subject RE: 83075-E Payment

Noted, thank you. Anything that can be done to expedite it would be appreciated.

-----Original Message-----

From: Lantz.Tracy@epamail.epa.gov [mailto:Lantz.Tracy@epamail.epa.gov]
Sent: Tuesday, October 02, 2007 10:43 AM
To: Tom Higgins
Cc: Noble.Velma@epamail.epa.gov
Subject: RE: 83075-E Payment

Our system has been updated to reflect that the full fee has been paid as of 9/12/07

Your clock has started with a due date of 1/10/08.

We will contact you should there be any concerns identified in either of the science reviews as well as any additional regulatory forms are necessary.

↓
chemistry data
unacceptable
↓
due date 1/10/08
↓ extend ↓ withdraw
↓
do not grant
↓
done 12/18 Fax both
reviews
↓
Tom will
call
tomorrow to
Dennis

Tom Higgins
<thigginsnbst@optonline.net>

09/27/2007 02:27
PM

To
Tracy Lantz/DC/USEPA/US@EPA
cc
Velma Noble/DC/USEPA/US@EPA
Subject
RE: 83075-E Payment

Tracy,
Check with John Jamula (703.305.6426), who I understand is out until

Monday,
abt the check for \$3150 and where it was applied. I assume that is why
it is
not showing up in yr system under our application symbol number. When
the
adjustment to our account is made will u retroactively start the clock
at
9/13/07 when the EPA cashed it? Yr other comments noted.

-----Original Message-----

From: Lantz.Tracy@epamail.epa.gov [mailto:Lantz.Tracy@epamail.epa.gov]
Sent: Thursday, September 27, 2007 12:59 PM
To: Tom Higgins
Cc: Noble.Velma@epamail.epa.gov
Subject: Re: 83075-E Payment

Who was it that indicated that your payment had been credited to a
different product?

Each product (as sold) must be supported by toxicity data. You have
asked us to decide if the toxicity data from a similar product will
support your product.
This determination must be made by a toxicologist. Your fee is based on
the fact that a toxicologist as well as a chemist and a regulatory
person will all review the information and make determinations regarding
whether your product has met the requirements for registration. Your
fee is based on the reviews which are performed. The fee is not
dependent on the outcome of the reviews.

Tom Higgins
<thigginsnbst@op
tonline.net>

09/27/2007 12:49
PM

Tracy Lantz/DC/USEPA/US@EPA

To

cc

Subject

83075-E Payment

Tracy,
Relative to the payment we made of \$3150 which was sent on 9/10/07 and
cashed by the EPA 9/13/07, yet not posted, I have found out the EPA
credited our funds to a third party. Therefore, I would like the clock
to start ticking on our application as of the 9/13/07 date as 2 weeks
have passed which has put us at a disadvantage. There is also another
issue I want to discuss, we have #83075-1 approved in a 5% concentrate
and in our master approved label we indicate dilution levels it is
approved for which can represent less than 1% of the active ingredient.
[REDACTED]

[REDACTED] [REDACTED]. Although you have indicated this would have to be reviewed for toxicity, my question is will they refund the money if all they do is look at the dilution, mindful that the heavier concentration has already been approved?

Tom Higgins
President/CEO
NBS Technology LLC
516.674.4085 P
> 516.759.5309 F **AX**
516.592.2847 C
thigginsnbst@optonline.net
www.nbsgoldshield.com

*** TX REPORT ***

TRANSMISSION OK

TX/RX NO 1777
CONNECTION TEL 915187595309
SUBADDRESS
CONNECTION ID
ST. TIME 12/18 17:38
USAGE T 02'02
PGS. 8
RESULT OK



United States Environmental Protection Agency
Washington, D.C. 20460

Office of Prevention, Pesticides and Toxic Substances
Office of Pesticides Programs
Antimicrobial Division

FAX NUMBER (703)

FACSIMILE REQUEST/COVER SHEET
(Please type or print clearly in black ink only)

SEND FAX TO:Name: Tom HigginsOffice: NBS TechnologiesFAX phone No. 516 759 5309Office Phone: 516 674 4085**FROM:**Name: Tracy LantzDivision/Branch: ADOffice Phone No: 703 308 6415Mail Code: 7510PDate: 12/18/07Time: 4:50 PMNumber of pages (with this cover sheet): 8



United States Environmental Protection Agency
Washington, D.C. 20460

Office of Prevention, Pesticides and Toxic Substances
Office of Pesticides Programs
Antimicrobial Division

FAX NUMBER (703)

FACSIMILE REQUEST/COVER SHEET
(Please type or print clearly in black ink only)

SEND FAX TO:

Name: Tom Higgins

Office: NBS Technologies

FAX phone No. 516 759 5309

Office Phone: 516 674 4085

FROM:

Name: Tracy Lantz

Division/Branch: AD

Office Phone No: 703 308 6415

Mail Code: 7510P

Date: 12/18/07

Time: 4:50 PM

Number of pages (with this cover sheet): 8

Special Message:

Acceptable Acute Tox Review
Unacceptable Product Chemistry Review

Please call Dennis Edwards on Wednesday to
discuss new time line. (703) 308 8087

John Jamula/DC/USEPA/US
10/01/2007 10:00 AM

To Tracy Lantz/DC/USEPA/US@EPA
cc Velma Noble/DC/USEPA/US@EPA
bcc
Subject Re: Fw: 83075-E Payment

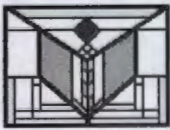
Tracy,

I posted this payment to OPPIN today. Our finance office messed it up by posting it to IFMS as a maintenance fee payment. It is now fixed.

JJ>

Tracy Lantz/DC/USEPA/US

*check status / start
date in OPPIN*



Tracy Lantz/DC/USEPA/US
09/27/2007 02:49 PM

To John Jamula/DC/USEPA/US@EPA
cc Velma Noble/DC/USEPA/US@EPA
Subject Fw: 83075-E Payment

*started 9/12
10/2 told Tom
Higgins that
full fee has
been credited.*

Is it correct that this payment was applied to another product?
If, so please let me know when we can expect this to be corrected.

Thanks

— Forwarded by Tracy Lantz/DC/USEPA/US on 09/27/2007 02:48 PM —



Tom Higgins
<thigginsnbst@optonline.net>

09/27/2007 02:27 PM

To Tracy Lantz/DC/USEPA/US@EPA
cc Velma Noble/DC/USEPA/US@EPA
Subject RE: 83075-E Payment

Tracy,
Check with John Jamula (703.305.6426), who I understand is out until Monday, about the check for \$3150 and where it was applied. I assume that is why it is not showing up in yr system under our application symbol number. When the adjustment to our account is made will u retroactively start the clock at 9/13/07 when the EPA cashed it? Yr other comments noted.

-----Original Message-----

From: Lantz.Tracy@epamail.epa.gov [mailto:Lantz.Tracy@epamail.epa.gov]
Sent: Thursday, September 27, 2007 12:59 PM
To: Tom Higgins
Cc: Noble.Velma@epamail.epa.gov
Subject: Re: 83075-E Payment

Who was it that indicated that your payment had been credited to a different product?

Each product (as sold) must be supported by toxicity data. You have

asked us to decide if the toxicity data from a similar product will support your product. This determination must be made by a toxicologist. Your fee is based on the fact that a toxicologist as well as a chemist and a regulatory person will all review the information and make determinations regarding whether your product has met the requirements for registration. Your fee is based on the reviews which are performed. The fee is not dependent on the outcome of the reviews.

Tom Higgins
<thigginsnbst@optonline.net>

09/27/2007 12:49 PM

Tracy Lantz/DC/USEPA/US@EPA

To

cc

Subject

83075-E Payment

Tracy,
Relative to the payment we made of \$3150 which was sent on 9/10/07 and cashed by the EPA 9/13/07, yet not posted, I have found out the EPA credited our funds to a third party. Therefore, I would like the clock to start ticking on our application as of the 9/13/07 date as 2 weeks have passed which has put us at a disadvantage. There is also another issue I want to discuss, we have #83075-1 approved in a 5% concentrate and in our master approved label we indicate dilution levels it is approved for which can represent less than 1% of the active ingredient.

[REDACTED] . Although you have indicated this would have to be reviewed for toxicity, my question is will they refund the money if all they do is look at the dilution, mindful that the heavier concentration has already been approved?

Tom Higgins
President/CEO
NBS Technology LLC
516.674.4085 P
516.759.5309 F
516.592.2847 C
thigginsnbst@optonline.net
www.nbsgoldshield.com

~~email to Michael~~
email to Michael
error all records
to be deleted. SCR ✓

83075-G - tell John to refund - G

9/5/07 John will make
new PRSA
and move # to -E

this was a reply to -E

apply fee - E ?

A54 repill @ \$4200 for -E? for review



83075-E

send to chemistry

(Some problems w/ CSF (nominal vs. label, total weight)

9/5/07 John will
send bill
for additional
\$ over \$1050.00

clock will start
when full fee
paid.

Similarity clinic - yes - Dennis agrees

Send Blackshield correct CSF for 70871-5

Call company:
Tell company to only pay \$3150 ✓



Tracy Lantz/DC/USEPA/US
09/05/2007 03:19 PM

To Michael Hardy/DC/USEPA/US
cc Dennis Edwards/DC/USEPA/US, velma noble
bcc
Subject Please send an SCR request

I know I am probably using the wrong terminology here, but basically John Jamula told me to contact you to have this cleaned up.

There never should have been a file symbol 83075-G. The company sent in additional information for 83075-E. Their paperwork indicated -E.

For some reason front end decided to call this -G. These is no -G product.

A bill was sent for -G and paid. John has applied that money to the -E product which had not been paid.

Please ask that all records for -G be deleted. This file symbol should not have been assigned.

Thanks, Tracy

John Jamula/DC/USEPA/US

09/05/2007 01:37 PM

To Tracy Lantz/DC/USEPA/US@EPA

cc

bcc

Subject Revised Invoice for 83075-E

PLEASE RETURN A COPY OF THIS LETTER WITH PAYMENT
Or Pay On-Line at www.Pay.Gov (See Below for Details)

OPP Decision Number: D-378983
EPA File Symbol or Registration Number: 83075-E
Product Name: GOLDSHIELD 75
EPA Receipt Date: 01-May-2007
EPA Company Number: 83075
Company Name: NBS TECHNOLOGY, LLC

JEFF JONES
DELTA ANALYTICAL CORP
NBS TECHNOLOGY, LLC
7910 WOODMONT AVE., SUITE 1000
BETHESDA, MD 20814

9/5/07
Spoke w/ Tom Higgins - 516 674 4085
told him to contact
John Jamula w/
corrected point of contact

no longer
their
contact
person

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee - Revised

Dear Registrant:

The Office of Pesticide Programs has received your application for registration. If you submitted data with this application, the results of the PRN-86-5 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: A54

NEW PRODUCT;NON-FAST TRACK;FIFRA SEC. 2(MM) USES;

The fee associated with this action is \$4,200. Payment in the amount of \$1,050 has been received. Please remit additional payment in the amount of \$3,150.

By USPS:

USEPA Washington Finance Center
Pesticide Registration Service Fee
PO Box 360277
Pittsburgh, PA 15251

□

By Courier:

U.S. EPA Washington Finance Center
Pesticide Registration Service Fee
C/O Mellon Client Service Center
500 Ross Street, Room 670
Box 360277
Pittsburgh, PA 15251-6277
Attn: EPA Module Supervisor
Telephone: (412) 236-2294

All payments must be in United States currency by check, bank draft, or money order drawn to the order of the Environmental Protection Agency. To ensure proper credit, please write the OPP DECISION NUMBER on your check, and enclose a copy of this letter with your payment.

Effective November 1, 2006, fees may be paid on-line via credit card or electronic fund transfer. To submit a payment on-line, visit www.pay.gov. From the [pay.gov](http://www.pay.gov) home page, select "search by form name." From the next page, select "P," then click on "Pesticide Registration Improvement Act. Fee Payment" and complete the form, making certain to use the decision number and registration number on the invoice you receive from the Pesticide Program in the space provided.

You may be eligible for a full or partial waiver of the registration service fee if, for example, you qualify as a small business or are applying for a minor use, or if your application is solely associated with an IR-4 tolerance petition. Please be advised that if you intend to request a waiver, you must do so in writing within 15 days of receipt of this invoice instead of remitting the amount indicated above. OPP will not consider waiver requests after the registration service fee has been paid. Information regarding eligibility and how to request and document a fee waiver is available on the OPP Fee for Service web site at www.epa.gov/pesticides/fees.

Please send Registration Service Fee Waiver requests to:

By USPS:

Document Processing Desk (WAIVER)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460

By Courier:

Document Processing Desk (WAIVER)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room S4900 Potomac Yard 1
2777 S. Crystal Dr.
Arlington, VA 22202

A PRIA decision time review period will not start until a fee waiver is granted and/or the Agency receives certification that the outstanding fee has been paid. If the Agency does not receive certification of payment for this action or a fee waiver request within the next 45 days, the Agency will presume that you no longer want to pursue this action. The Agency will then initiate a process that may result in administrative withdrawal of this action.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 308-6432.

Sincerely,

Front End Processing Staff
Information Technology & Resources Management Division

Tracy

Note to the File

Summary of Company Response to 75 day letter: 83075-E

6/6/07 Send 75 day letter.

6/12/07 Left message for Ted regarding 75 day letter receipt.

6/20/07 E-mailed 75 day letter to Ted.

8/2/07 They faxed 75 day letter to me for discussion. I called and left message. Fee has not been paid.

8/6/07 Received new cover letter, Enforcement Analytical Method with MRID, Data Comp form (wrong file symbol) with data submitters list, CSF with wrong file symbol, formulator's exemption w/o Reg. No. and wrong file symbol, data matrix with wrong file symbol and citations of data which will not support this product, one copy of label.

8/14/07 Left message for Ted

8/15/07 Left message for Ted

8/15/07 Tom returned my call (516 674 4085). Discussed issues including they have not paid, cited product chemistry on 5% will not support, They would like to cited data on a different formula at 0.75% for chemistry and tox. Told them we may have to do a similarity clinic for the tox data.

8/16/07 Velma and I spoke with Tom. He indicated that they would send a new CSF via Fed Ex, will send a new label with the correct file symbol -E, told him that the Enforcement Analytical Method has receive an MRID, they want to cite data on 70871-10 (me-too) and will revise their data matrix to reflect this, will also send new waiver for tox study.

8/21/07 Tracy called about package delivery status

8/28/07 Tracy left message that we have not received package. Must have confirmation or reply by COB 8/29 or will discuss withdrawl with my management.

8/29/07 Spoke with Ted. He said he will FAX the confirmation of receipt of package by EPA. Also said they had not paid the fee. (Not yet recorded in OPPIN.) I told them that this changes everything. If the fee is paid and we still have an incomplete package we can still withdraw or they will need to renegotiate the time frame. I also strongly suggested that they FAX the new information to me.

8/29/07 Listened to a phone message from Tom Higgins. He said he just paid a fee but for a product with a different file symbol. We need to determine if this is due to new info coming in for -E which was possibly given a fee file symbol in error? Asked for FAXed copy of bill.

8/29/07 Received FAX of Fed Ex delivery and bill for **83075-G, which they indicated they had paid.**

8/30/07 Tom Faxed the package to me today. I have looked briefly at the package. Label indicates that product is at .75% AI. Tom had indicated to Velma and I that the matrix would list the MRIDs for the BioShield product that was just like his. Matrix uses "cite all" and lists NBST as submitter. Cover letter indicates that they are "me-tooing" 70871-5 (now 70871-19) which appears to be the same AI at the same percentage.

Chemistry-ask the chemists to review self certification, CSF and decide whether 70871-5 (now 70871-19) data will support.

Toxicity-compare CSFs, send for Tox bridging

Tom indicated by phone that they have not sent in another product. OPPIN shouldn't have indicated that there was a -G file symbol nor should a fee be charged for -G. They need to pay the fee for this product, -E.



U.S. Environmental Protection Agency Office of Pesticide Programs Information Network

Results

1 Items Found

DETAILS

- Summary
- Sites / Pests
- Site / Pest Matrix
- Studies
- Data Requirements
- Repository
- Distributors
- Product Details
- Related Products
- DCI
- Transfer History

[Back to Query](#)

SUMMARY REPORTS

- Registrations
- Registrations / Transferred

OPTIONS

- Help
- Logout

Registration

1) 70871-5

⏪ ⏩ ⏴ ⏵

Summary Information For Product Registration - Section 3 70871-19

This product has been transferred.

Registration #: 70871-19

Registration Name: BST PROTECTANT RTU 75

Company: 70871 - INTERNATIONAL BIOCHEMICAL INDUSTRIES, INC.

Current Status: Active - Conditionally Registered (27-Sep-2000)

Restricted Use: No

Active Ingredients

PC Code	CAS #	Ingredient Name	Percent Active
107401	27668-52-6	1-Octadecanaminium, N,N-dimethyl-N-(3-(trimethoxysilyl)propyl)-, chloride	.75
Total Rows: 1			

Organization: AD / RMB1

Team: Antimicrobials Division, Risk Management Team 31
Noble, Velma (703) 308-6233

Child Resistant Package:

Signal Word: Caution

Physical Form: Soluble Concentrate

Pesticide Category: FUNGICIDE
ALGAECIDE
MICROBICIDE/MICROBISTAT

Label Image: [View Label Image](#)

Note to the File

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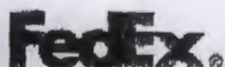
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US Home

Español

Post-It® Fax Note 7671

Date 8/20/07 # of pages 3

To MS. TRACY LANTZ	From TED SHLISKY
Co./Dept.	Co.
Phone #	Phone #
Fax #	Fax #

Support | Site Map

Package / E

Services

Ship

Track

Manage My Account

International Tools

Track Shipments
Detailed Results
[Printable Version](#)
[Quick Help](#)

Tracking number 862905118240
 Signed for by L. VISSE
 Ship date Aug 17, 2007
 Delivery date Aug 20, 2007 11:32 AM
 Status Delivered
 Signature image available Yes

Delivered to
 Service type

Mailroom
 Priority Envelope

Wrong Address?

Reduce future mistakes by using
 FedEx Address Checker.

Tracking a FedEx SmartPost
 Shipment?
 Go to shipper login

Date/Time	Activity	Location	Details
Aug 20, 2007 11:32 AM	Delivered		
10:22 AM	Delivery exception	ALEXANDRIA, VA	Recipient location security delay. Delivery will be reattempted.
8:21 AM	On FedEx vehicle for delivery	ALEXANDRIA, VA	
7:45 AM	At local FedEx facility	ALEXANDRIA, VA	
Aug 18, 2007 9:40 AM	At dest sort facility	DULLES, VA	
3:35 AM	Departed FedEx location	NEWARK, NJ	
Aug 17, 2007 8:36 PM	Left origin	HICKSVILLE, NY	
8:16 PM	Picked up	HICKSVILLE, NY	

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E-mail address

Language

Exception updates

Delivery updates

<input type="text"/>	English	<input type="checkbox"/>	<input type="checkbox"/>
<input type="text"/>	English	<input type="checkbox"/>	<input type="checkbox"/>
<input type="text"/>	English	<input type="checkbox"/>	<input type="checkbox"/>
<input type="text"/>	English	<input type="checkbox"/>	<input type="checkbox"/>

Select format: ☒ HTML ☐ Text ☐ Wireless

Add personal message:



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

August 22, 2007

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

PLEASE RETURN A COPY OF THIS LETTER WITH PAYMENT
Or Pay On-Line at www.Pay.Gov

OPP Decision Number: D-382781
EPA File Symbol or Registration Number: 83075-G
Product Name: NBST GOLDSHIELD
EPA Receipt Date: 20-Aug-2007
EPA Company Number: 83075
Company Name: NBS TECHNOLOGY, LLC

TED SHLISKY
NBS TECHNOLOGY, LLC
PO BOX 428
LOCUST VALLEY, NY 11560

SUBJECT: Receipt of Application Subject to Registration Service Fee - Fast Track

Dear Registrant:

The Office of Pesticide Programs has received your application for registration. If you submitted data with this application, the results of the PRN-86-5 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: A53
ME-TOO;NEW PRODUCT;FAST TRACK;

Within 30 days, please remit payment in the amount of: \$ 1,050 to the address below.

If you do not submit payment within 30 days of the date of this letter, the Agency will reject your application pursuant to Section 3(c)(3)(B) of FIFRA. Any subsequent submission relating to this action must be submitted as a new application.

By USPS:

USEPA Washington Finance Center
Pesticide Registration Service Fee
PO Box 360277
Pittsburgh, PA 15251

By Courier:

U.S. EPA Washington Finance Center
Pesticide Registration Service Fee
C/O Mellon Client Service Center
500 Ross Street, Room 670
Box 360277
Pittsburgh, PA 15251-6277
Attn: EPA Module Supervisor
Telephone: (412) 236-2294

All payments must be in United States currency by check, bank draft, or money order drawn to the order of the Environmental Protection Agency. To ensure proper credit, please write the OPP DECISION NUMBER on your check, and enclose a copy of this letter with your payment.

You may be eligible for a full or partial waiver of the registration service fee if, for example, you qualify as a small business or are applying for a minor use, or if your application is solely associated with an IR-4 tolerance petition. Please be advised that if you intend to request a waiver, you must do so in writing within 15 days of receipt of this invoice instead of remitting the amount indicated above. OPP will not consider waiver requests after the registration service fee has been paid. Information regarding eligibility and how to request and document a fee waiver is available on the OPP Fee for Service web site at www.epa.gov/pesticides/fees.

Please send Registration Service Fee Waiver requests to:

By USPS:

Document Processing Desk (WAIVER)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, D.C. 20460

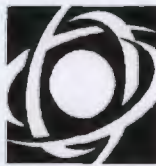
By Courier:

Document Processing Desk (WAIVER)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

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If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 308-6432.

Sincerely, *Teresa Downe*
Front End Processing Staff
Information Technology & Resources Management Division



Goldshield™

FACSIMILIE

NBST Technology, LLC
P.O.Box 428
157 Skunks Misery Rd.
Locust Valley, New York 11560
thigginsnbst@optonline.net
enbst@optonline.net

516.674.4085P

To: Tracy Lanz
From: Tom Higgins
Date: 8/30/07

Re: 83075-E

Please find enclosed documents we re-submitted and the letter we received shortly thereafter from the EPA, wherein the symbol number was changed to 83075-G. Please confirm receipt of these documents either by phone or my email address: thigginsnbst@optonline.net

Tom Higgins

rec'd
8/30/07
fax of submitted
info. FrontEnd
appears to
have coded as
new product
w/ new fee

516.759.5309 F

This is
83075-E
as indicated
by cover
letter.

2nd Reply to 75
day letter

Tom Higgins had indicated to
Velma and I that he was
planning to cite a BioShield
product for chemistry + tox.
His data matrix does not
reflect this - just uses ^{they are} and that the submitter
the cite all option. Appl.
for pesticide notes 70871-15. ^{? to 4% of funds}
or ~~70871-1~~ 1
70871-5 ? ~~5~~
↓
transferred to 70871-19



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

August 22, 2007

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

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U.S. EPA Washington Finance Center
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Please send Registration Service Fee Waiver requests to: -----

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Document Processing Desk (WAIVER)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, D.C. 20460

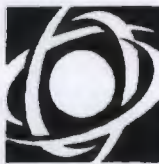
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2777 S. Crystal Drive.
Arlington, VA 22202

A PRIA decision time review period will not start until a fee waiver is granted and/or the Agency receives certification that the outstanding fee has been paid. If the Agency does not receive certification of payment for this action or a fee waiver request within the next 45 days, the Agency will presume that you no longer want to pursue this action. The Agency will then initiate a process that may result in administrative withdrawal of this action.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 308-6432.

Sincerely, *Teresa Downs*
Front End Processing Staff
Information Technology & Resources Management Division



Goldshield™

NBS Technology, LLC

157 Skunks Misery Rd.

P.O.Box 428

Locust Valley, New York 11560

thigginsnbs@optonline.net

516.674.4085P

516.759.5309 F

To: Velma Noble & Tracy Lanz

From: Ted Shlisky

Date: 8/17/07

Re 83075- *E*

Dear Velma and Tracy,

Per yesterday's conversation, and I thank you for taking the time, I have itemized the enclosures below and wanted to point out a discrepancy in reg. nos.

a) For the product we are citing as a "me-too" it shows up in the EPA Database as #070871-5, BST Protectant RTU 75, under Nov Biogenetics, Inc., yet in the NPRIS it is listed as #070871-19. It is also listed in the EPA database as #75497-5 under Sishield Technologies, Inc.

For our purposes, we have used your listing as the reference product number and name that being, #070871-5 BST Protectant-RTU 75.

- b) Revise CSF form # 8570-4
- c) Corrected forms 8570-36 and 8570-37
- d) Corrected form citation of data form \$ 8570-34 and 8570-35
- e) Corrected form 8570-27
- f) Offer to pay letter with two additional companies
- g) Revised form 8570-1

Sincerely,
Ted Shlisky



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

August 7, 2007

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

NBS TECHNOLOGY, LLC
7910 WOODMONT AVE., SUITE 1000
BETHESDA, MD 20814-

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 06-AUG-07. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

Receipt for Section 3

S: B14529

Resubmission: ☒ Yes ☐ No

Regulatory Type: Product Registration - Section 3

Fee For Service: ☐ Yes ☒ No

Application Type: Pending Product Amendment

Billable: ☐ Yes ☒ No

Company: B3075 NBS TECHNOLOGY, LLC

V

Print Letter

Enter More Information

Tracking

Risk Manager: Antimicrobials Division, Risk Management Team 31

Product #: B3075-E Product Name: GOLDSHIELD 75

Override#:

Me Too

Me Too

Section3: 70871-19

Product Name: BST PROTECTANT RTU 75

Application Date: 03-Aug-2007

OPP Rec'd Date: 06-Aug-2007

Front End Date: 06-Aug-2007

Risk Manager Send Date: 06-Aug-2007

FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track:

New Ingredient:

Receipt Description:

Response to agency request dated June 6, 2007: Enforcement analytical method, labels, formulator's exemption statement, rationale for waiver of dermal sensitiz data requirement...

New Ingredient

Request Date:

New Ingredient

Received Date:

Form A:

Signature Date:

Form B:

Signature Date:

Receipt Content

Study

**Goldshield™****NBS Technology, LLC**

157 Skunks Misery Rd.

P.O.Box 428

Locust Valley, New York 11560

Phone 516.674.4085

Fax 516.759.5309

August 3, 2007

Document Processing Desk (RESUB)

Attn: Velma Noble

Office of Pesticide Programs

Environmental Protection Agency

Washington, DC 20460

re: **Response to request for further information; Agency letter dated June 6, 2007**

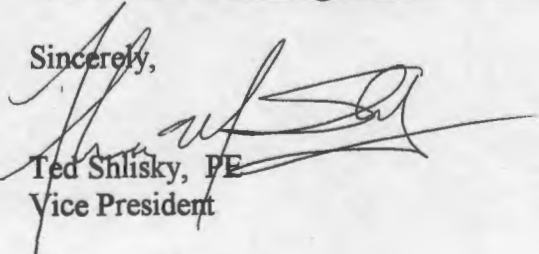
OPP Decision Number: D-378983**Product: Goldshield 75****EPA File Symbol: 83075-E****Company: NBS Technology, LLC**

Dear Ms Noble:

Enclosed please find the documentation in answer to your concerns put forth in your above referenced letter.

If you have any questions regarding this submission, please contact me at your convenience at mdvdt@aol.com. Thank you for your consideration.

Sincerely,



Ted Shlisky, PE
Vice President

Enclosures:

1. Certification with respect Citation of Data (form 8570-34)
2. Data Matrix (form 8570-35)
3. List of Companies offer to pay letters
4. Rationale for Waiver of Dermal Sensitization Data Requirement
5. Formulator's Exemption Statement (form 8570-27)
6. Confidential Statement of Formula (form 8570-4)
7. Master Label revision
8. Enforcement Analytical Method: Goldshield 75 (3 copies)

47197401



Goldshield™

NBS Technology, LLC

157 Skunks Misery Rd.

P.O.Box 428

Locust Valley, New York 11560

Phone 516.674.4085

Fax 516.759.5309

August 3, 2007

Document Processing Desk (RESUB)

Attn: Velma Noble

Office of Pesticide Programs

Environmental Protection Agency

Washington, DC 20460

re: Response to request for further information; Agency letter dated June 6, 2007

OPP Decision Number: D-378983

Product: Goldshield 75

EPA File Symbol: 83075-E

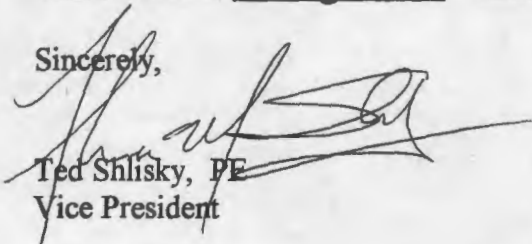
Company: NBS Technology, LLC

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Enclosed please find the documentation in answer to your concerns put forth in your above referenced letter.

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Sincerely,


Ted Shlisky, PE
Vice President

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6. Confidential Statement of Formula (form 8570-4)
7. Master Label revision
8. Enforcement Analytical Method: Goldshield 75 (3 copies)

47197401



Goldshield™

NBS Technology, LLC
157 Skunks Misery Rd.
P.O.Box 428
Locust Valley, New York 11560

516.674.4085P

516.759.5309 F

August 2, 2007

Ms. Tracy Lantz, Product Manager
USEPA
Antimicrobial Division

Via Fax

*check OPPIN + jacket
call him to discuss*

*as of 8/2 fee
not paid*

*8/2 - called - left
message*

Dear Ms. Lantz,

I've enclosed a copy of your letter to us relative to our Goldshield 75 product application, per our conversation yesterday afternoon.

Once you have read it, please call me at 631 737 4850 ext 126 so we can discuss some questions I have regarding your request.

Thank you,

Ted Shlisky, VP
NBS Technology

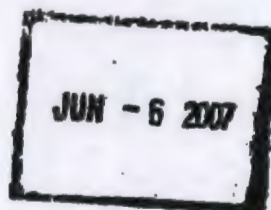


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

OPP Decision Number: D-378983

Mr. Theodore Shlisky
NBS Technology, LLC
P.O. Box 428
157 Skunks Misery Road
Locust Valley, NY 11560



Subject: Product Name: Goldshield 75
EPA File Symbol: 83075-E
Application Date: April 20, 2007
EPA Receipt Date: May 1, 2007

has he paid?

Dear Mr. Shlisky:

Our records indicate that the decision review period for EPA to make a determination regarding the above referenced application will end four months from the date which your fee is paid pursuant to the Pesticide Registration Improvement Act (PRIA). This application has been determined, pursuant to 40 CFR 152.105, not to be sufficiently complete to process; therefore, the application is considered deficient. Information to address the issues specified below must be submitted before the processing of the application can be completed.

If, after 75 days from the date of this letter, you do not respond, or you subsequently fail to submit a completed application within the time scheduled for completion, the Agency will terminate any action on the application, and will treat the application as if it has been withdrawn by the applicant. This action would result in your submission being removed from the provisions of both the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and PRIA. Any subsequent re-submission relating to the application must be submitted as a new PRIA application and subject to a fee.

CONFERENCES							
SYMBOL	7510P						
REFERENCE	378983						
DATE	6/5/07						

Printed on Recycled Paper

OFFICIAL FILE COPY

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

The following concerns must be addressed:

1. Your application must include a Confidential Statement of Formula (CSF). Submit a completed CSF which clearly identifies the ingredients and source of the ingredients used to formulate this product.
2. Submit a revised label for this product. The submitted label does not correctly identify the active ingredient. If this product is a dilution of 83075-1, as your application states, then the active ingredient nomenclature must agree with this product. Revise the active ingredient name to read: 3-(Trihydroxysilyl) propyldimethyloctadecyl ammonium chloride.
3. You have submitted one study for review: an Enforcement Analytical Method. This study has been rejected due to PR Notice 86-5 deficiencies. The following issues must be addressed regarding this study:
 - a. Page three appears to have been omitted.
 - b. Each study must be continuously paginated from the title page through the end of the study and all appendices except for the Confidential Attachment or Supplemental Statement of Confidentiality Claims.
 - c. You must include one of the two acceptable statements of data confidentiality claims under FIFRA section 10(d)(1)(A), (B), or (C) as the second element in each study. The language of two alternative forms of the Statement of Data Confidentiality Claims, shown in Attachment 3 of PR Notice 86-5, cannot be altered. See pages 8 and 13 of the Notice.
 - d. You provided fewer than the required three complete copies of submitted data. Submit the corrected study in triplicate.
4. You must **submit Product Chemistry data to support your formulation**. You may not rely on data conducted on a more concentrated formula. You must submit all of the OPPTS Test Guideline Series 830 Product Chemistry data (Parts A and B) requirements conducted on the proposed product's formulation, under the conditions of the Good Laboratory Practices (GLP) or thoroughly describe the differences in your studies when compared to those run under GLP. Refer to 40 CFR Section 158.150-190 for the requirements for the proposed product.
5. It appears that you would like to request a waiver for the acute toxicity data requirement for dermal sensitization. Submit a written waiver which includes a scientific rationale to the Agency.
6. Provide information as to how you intend to support the Generic Data requirements. Submit a Formulator's exemption, if appropriate, or a Data Matrix as well as a Certification with Respect to Citation of Data form.

how is he
supporting
acute tox?
(check jacket)
cite all

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

Printed on Recycled Paper

OFFICIAL FILE COPY

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

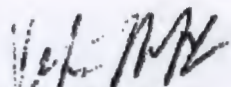
Information to address the issues specified above must be submitted before the processing of this application can be completed.

You have the following three options.

1. **Resolve the issue(s).** You may resolve the issue(s) identified in this letter by submitting the information requested above to address these concerns. Please include your proposed re-negotiated PRIA due date and the date you expect to submit the fix at this time. If your fee has been paid, your re-negotiated PRIA due date must include the date that you expect to submit the fix plus an additional 4 (four) months for Agency review.
2. **Withdraw.** If you are not ready to supply the requested material at this time or in the very near future, you may choose to advise the Agency that you would like to withdraw this application at this time.
3. **Do nothing.** If you do not respond to this letter or if you do not wish to re-negotiate the PRIA deadline, the Agency will administratively withdraw the submission 75 days from the date of this letter. Once the application is administratively withdrawn, if you intend to pursue this use, you will need to submit a new application to the Agency and this new submission will be subject to a new PRIA fee.

If you have questions concerning this letter, please contact Tracy Lantz by telephone 703-308-6415 or by e-mail at Lantz.tracy@epa.gov

Sincerely,



Velma Noble
Product Manager Team 31
Regulatory Branch I
Antimicrobials Division (7510P)

7510P-T Lantz 6/4/07:83075 E 75 day			CONCURRENCES				
SYMBOL							
SURNAME							
DATE							

EBS Form 4000-1A (1/00)
 Printed on Recycled Paper
OFFICIAL FILE COPY

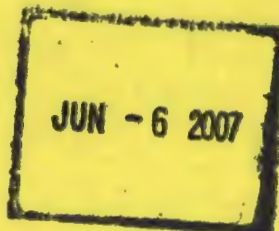


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

OPP Decision Number: D-378983

Mr. Theodore Shlisky
NBS Technology, LLC
P.O. Box 428
157 Skunks Misery Road
Locust Valley, NY 11560



Subject: Product Name: Goldshield 75
EPA File Symbol: 83075-E
Application Date: April 20, 2007
EPA Receipt Date: May 1, 2007

Dear Mr. Shlisky:

Our records indicate that the decision review period for EPA to make a determination regarding the above referenced application will end four months from the date which your fee is paid pursuant to the Pesticide Registration Improvement Act (PRIA). This application has been determined, pursuant to 40 CFR 152.105, not to be sufficiently complete to process; therefore, the application is considered deficient. Information to address the issues specified below must be submitted before the processing of the application can be completed.

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CONCURRENCES

SYMBOL	7510P						
SURNAME	J. L. [unclear]						
DATE	6/5/07						

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

The following concerns must be addressed:

1. Your application must include a Confidential Statement of Formula (CSF). Submit a completed CSF which clearly identifies the ingredients and source of the ingredients used to formulate this product.
2. Submit a revised label for this product. The submitted label does not correctly identify the active ingredient. If this product is a dilution of 83075-1, as your application states, then the active ingredient nomenclature must agree with this product. Revise the active ingredient name to read: 3-(Trihydroxysilyl) propyldimethyloctadecyl ammonium chloride.
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6. Provide information as to how you intend to support the Generic Data requirements. Submit a Formulator's exemption, if appropriate, or a Data Matrix as well as a Certification with Respect to Citation of Data form.

CONCURRENCES

SYMBOL								
SURNAME								
DATE								

214

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

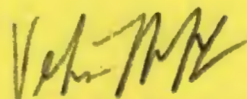
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You have the following three options.

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If you have questions concerning this letter, please contact Tracy Lantz by telephone 703-308-6415 or by e-mail at Lantz.tracy@epa.gov

Sincerely,



Velma Noble
Product Manager Team 31
Regulatory Branch I
Antimicrobials Division (7510P)

7510P:T.Lantz:6/4/07:83075 E 75 day				CONCURRENCES			
SYMBOL							
SURNAME							
DATE							

215



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

May 14, 2007

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

DELTA ANALYTICAL CORP
NBS TECHNOLOGY, LLC
7910 WOODMONT AVE., SUITE 1000
BETHESDA, MD 20814-

83075-E

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 01-MAY-07. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

We are unable to accept your data submittal for further processing and review, because of the significant deficiencies noted below. It is being returned to you for correction. If deficiencies were found which apply to your overall submission, they are described immediately following this paragraph. If problems are found with individual studies, they are described below linked to the study identifier found on the enclosed copy of your bibliography.

Rejected Study [01]:

- * Judging from the pagination of the study, page 3 was omitted from the submitted copy.
- * Each study must be continuously paginated from the title page through the end of the study and all appendices ~~except~~ for the Confidential Attachment or Supplemental Statement of Confidentiality Claims, if present ~~even~~ when the study is large enough to span more than one physical volume.
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- * You provided fewer than the required three complete copies of submitted data.

Receipt for Section 3			
S:	909596	Resubmission:	<input type="radio"/> Yes <input checked="" type="radio"/> No
Regulatory Type:	Product Registration - Section 3	Fee For Service:	<input checked="" type="radio"/> Yes <input type="radio"/> No
Application Type:	New Registration	Billable:	<input checked="" type="radio"/> Yes <input type="radio"/> No
Company:	83075 NBS TECHNOLOGY, LLC		V
Risk Manager:	Antimicrobials Division, Risk Management Team 31		
Product #:	83075-E	Product Name:	GOLDSHIELD 75
Override#:			
Me Too Section3:	75497-S	Me Too Product Name:	BST PROTECTANT RTU 75
Application Date:	20-Apr-2007	OPP Rec'd Date:	01-May-2007
Front End Date:	01-May-2007	Risk Manager Send Date:	
FFS Due Date:		Negotiated Due Date:	
OPP Target Date:			
Fast Track:	<input type="checkbox"/>	New Ingredient:	<input type="checkbox"/>
Receipt Description:		New Ingredient Request Date:	
APPLICATION FOR REGISTRATION OF NEW PRODUCT		New Ingredient Received Date:	
Form A:	<input type="checkbox"/>	Signature Date:	
Form B:	<input type="checkbox"/>	Signature Date:	

Print Letter

Enter More Information

Tracking

Receipt Content

Study



NBS Technology, LLC
157 Skunks Misery Rd.
P.O.Box 428
Locust Valley, New York 11560

516.674.4085P

516.759.5309 F

April 25, 2007

Document Processing Desk (APPL)
Office of Pesticide Programs (7510P)
Attn. Ms. Velma Noble
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460

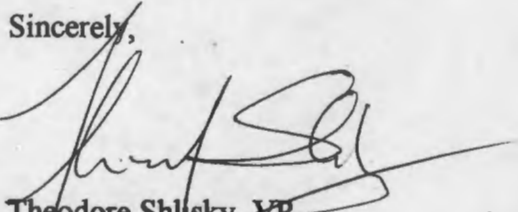
Reject (01) Re: Application for Goldshield 75

Dear Ms. Noble:

Enclosed please find our application for Goldshield 75, a diluted version of our approved Goldshield 5 product.

If you have any questions regarding this submission, please contact me at your convenience at mdvdt@aol.com. Thank you for your consideration.

Sincerely,



Theodore Shlisky, VP
NBS Technology, LLC



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

May 14, 2007

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

DELTA ANALYTICAL CORP
NBS TECHNOLOGY, LLC
7910 WOODMONT AVE., SUITE 1000
BETHESDA, MD 20814-

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 01-MAY-07. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

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- * You provided fewer than the required three complete copies of submitted data.



NBS Technology, LLC
157 Skunks Misery Rd.
P.O.Box 428
Locust Valley, New York 11560

516.674.4085P

516.759.5309 F

April 25, 2007

Document Processing Desk (APPL)
Office of Pesticide Programs (7510P)
Attn. Ms. Velma Noble
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460

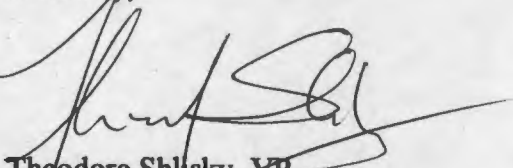
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Sincerely,



Theodore Shlisky, VP
NBS Technology, LLC



NBS Technology, LLC
157 Skunks Misery Rd.
P.O.Box 428
Locust Valley, New York 11560

516.674.4085P

516.759.5309 F

April 25, 2007

Document Processing Desk (APPL)
Office of Pesticide Programs (7510P)
Attn. Ms. Velma Noble
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460

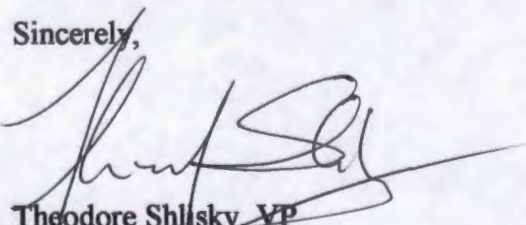
Reject (01) Re: Application for Goldshield 75

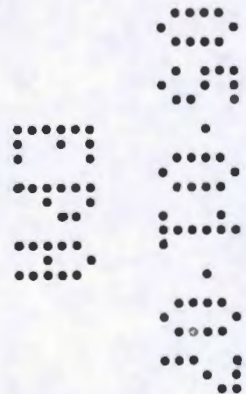
Dear Ms. Noble:

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If you have any questions regarding this submission, please contact me at your convenience at mdvdt@aol.com. Thank you for your consideration.

Sincerely,


Theodore Shlisky, VP
NBS Technology, LLC





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

May 9, 2007

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

PLEASE RETURN A COPY OF THIS LETTER WITH PAYMENT
Or Pay On-Line at www.Pay.Gov (See Below for Details)

OPP Decision Number: D-378983
EPA File Symbol or Registration Number: 83075-E
Product Name: GOLDSHIELD 75
EPA Receipt Date: 01-May-2007
EPA Company Number: 83075
Company Name: NBS TECHNOLOGY, LLC

JEFF JONES
DELTA ANALYTICAL CORP
NBS TECHNOLOGY, LLC
7910 WOODMONT AVE., SUITE 1000
BETHESDA, MD 20814-

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application for registration. If you submitted data with this application, the results of the PRN-86-5 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: A54

NEW PRODUCT;NON-FAST TRACK;FIFRA SEC. 2(MM) USES;

Please remit payment in the amount of: \$ 4,200 to:

By USPS:
USEPA Washington Finance Center
Pesticide Registration Service Fee
PO Box 360277
Pittsburgh, PA 15251

By Courier:

U.S. EPA Washington Finance Center
Pesticide Registration Service Fee
C/O Mellon Client Service Center
500 Ross Street, Room 670
Box 360277
Pittsburgh, PA 15251-6277
Attn: EPA Module Supervisor
Telephone: (412) 236-2294

All payments must be in United States currency by check, bank draft, or money order drawn to the order of the Environmental Protection Agency. To ensure proper credit, please write the OPP DECISION NUMBER on your check, and enclose a copy of this letter with your payment.

Effective November 1, 2006, fees may be paid on-line via credit card or electronic fund transfer. To submit a payment on-line, visit www.pay.gov. From the pay.gov home page, select "search by form name." From the next page, select "P," then click on "Pesticide Registration Improvement Act. Fee Payment" and complete the form, making certain to use the decision number and registration number on the invoice you receive from the Pesticide Program in the space provided.

You may be eligible for a full or partial waiver of the registration service fee if, for example, you qualify as a small business or are applying for a minor use, or if your application is solely associated with an IR-4 tolerance petition. Please be advised that if you intend to request a waiver, you must do so in writing within 15 days of receipt of this invoice instead of remitting the amount indicated above. OPP will not consider waiver requests after the registration service fee has been paid. Information regarding eligibility and how to request and document a fee waiver is available on the OPP Fee for Service web site at www.epa.gov/pesticides/fees.

Please send Registration Service Fee Waiver requests to:

By USPS:

Document Processing Desk (WAIVER)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460

By Courier:

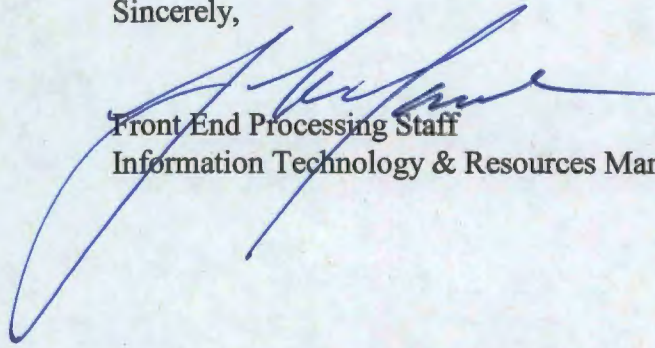
Document Processing Desk (WAIVER)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room S4900 Potomac Yard 1
2777 S. Crystal Dr.
Arlington, VA 22202

A PRIA decision time review period will not start until a fee waiver is granted and/or the Agency receives certification that the outstanding fee has been paid. If the Agency does not receive certification of payment for this action or a fee waiver request within the next 45 days, the Agency will presume that you no longer want to pursue this action. The Agency will then initiate a process that may result in administrative withdrawal of this action.

If you have any questions, please contact the Pesticide Registration Service Fee

Ombudsman at (703) 308-6432.

Sincerely,

A handwritten signature in blue ink, appearing to be "A. H. [unclear]", written over the typed name.

Front End Processing Staff
Information Technology & Resources Management Division

NEW APPLICATIONS

DATE: APR 30 2007

FILE NUMBER: 83075-IE

FEP (OPPIN ENTRY): AV 5/1/2007
(Initial & date)

FILE ROOM: _____
(Initial & date)

SIG: KC 5/10/07
(Initial & date)

FILE ROOM: _____
(Initial & date)

☒ **ASSIGN TO PM** 31 **(NO DATA)**

☐ **JACKET TO SHELF (DATA)**



Goldshield™

NBST

PRODUCT

Goldshield™ 75

EMERGENCY TELEPHONE NUMBER

(800)262-8200 (24 Hours) CHEMTREC

1. CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

PRODUCT NAME : **Goldshield™ 75**

CHEMICAL DESCRIPTION : Organosilane

COMPANY IDENTIFICATION : NBS Technology, LLC
157 Skunks Misery Rd. (PO Box 428)
Locust Valley, New York 11560
Ph: 516.674.4085; toll free 866.NBST.889

EMERGENCY TELEPHONE NUMBER : (800)262-8200 (24 Hours) CHEMTREC

2. COMPOSITION/INFORMATION ON INGREDIENTS

Our hazard evaluation has identified the following chemical substance(s) as hazardous. Consult Section 15 for the nature of the hazard(s).

<u>Hazardous Substance(s)</u>	<u>CAS NO.</u>	<u>% Weight</u>	<u>TWA</u>	<u>STEL</u>
3-(Trimethoxysilyl)propyldimethyloctadecyl ammonim chloride	27668-52-6	0.75%	N/A	N/A

The above information is not intended for use in preparing product specifications.

3. HAZARDS IDENTIFICATION

****EMERGENCY OVERVIEW****

Warning:

SLIGHTLY IRRITATING TO THE EYES. HARMFUL IF INJECTED OR INHALED.

Do not get in eyes or on clothing. Avoid contact with skin or clothing, and avoid breathing vapor. Wear protective eyewear (goggles or face shield). Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before use.

PRIMARY ROUTES OF ENTRY :

Inhalation, skin contact, ingestion, and eye contact



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POTENTIAL HEALTH EFFECTS :

EYES:

Slightly irritating to the eyes .

SKIN:

May cause slight irritation.

INGESTION :

Harmful if swallowed.

INHALATION :

Harmful if inhaled for long periods.

MEDICAL CONDITIONS GENERALLY AGGRAVATED BY EXPOSURE: Not known

CARCINOGENS:

OSHA: No ACGIH: No NTP: No IARC: No

SECTION 3 NOTES: none

The above listed potential effects of overexposure are based on actual data, results of studies performed upon similar compositions, component data, and/or expert review of the product.

4. FIRST AID MEASURES

EYES: Hold eye open and flush with a steady, gentle stream of water for 15-20 minutes. If present remove contact lenses after the first 5 minutes, then continue rinsing. Call a poison control center or doctor for treatment advice.

SKIN: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

INGESTION: Call a poison control center or doctor immediately for treatment advice. Have the person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.



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INHALATION: Move person to fresh air. If not breathing, give artificial respiration. Seek medical attention.

SECTION 4 NOTES: Treat the same as methyl alcohol poisoning.

5. FIRE FIGHTING MEASURES

FLAMMABLE LIMITS IN AIR :

UPPER: N/A

LOWER: N/A

FLASH POINT:

N/A

EXTINGUISHING MEDIA:

N/A

SPECIAL FIRE FIGHTING PROCEDURES:

N/A

UNUSUAL FIRE AND EXPLOSION HAZARDS:

N/A

HAZARDOUS DECOMPOSITION PRODUCTS:

N/A

SECTION 5 NOTES: None

6. ACCIDENTAL RELEASE MEASURES

ACCIDENTAL RELEASE MEASURES :

Steps to be taken if material is released or spilled: Do not contaminate water, food, or feed by material. Disposal of collected product, residues, and clean-up materials may be governmentally regulated. Observe all applicable local, state, and federal waste management regulations. Mop, wipe, or soak up with absorbent and contain for salvage or disposal. Clean any remaining slippery surfaces by appropriate techniques, such as: several moppings or swabbings with appropriate solvents; washing with mild, caustic detergents or solutions, or high pressure steam for large areas. For non-silicones, use typical industrial cleaning materials. Observe any safety precautions applicable to the cleaning material being used. See applicable regulatory compliance information in section 15.

SECTION 6 NOTES: See Section 8 for Personal Protective Equipment for Spills.

7. HANDLING AND STORAGE

HANDLING : Wear appropriate personal protective equipment. (See Section 8)

STORAGE: Store in original closed container in a secure area inaccessible to children and away from food or feed.

OTHER PRECAUTIONS: Do not freeze product

SECTION 7 NOTES: None



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8. EXPOSURE CONTROLS/PERSONAL PROTECTION

ENGINEERING CONTROLS: Local exhaust and General exhaust recommended.

RESPIRATORY PROTECTION: Use respiratory protection unless adequate local exhaust ventilation is provided or air sampling data shows exposures are within recommended exposure guidelines. Industrial Hygiene Personnel can assist in judging the adequacy of existing engineering controls. A suitable respirator would be a self-contained breathing apparatus (SCBA) or other supplied respirator.

EYE PROTECTION: Wear protective eyewear (goggles, face shield, or safety glasses with side shields.)

SKIN PROTECTION: Chemical protective gloves are recommended. (suitable gloves: SilverShield®, 4H®, Viton®)

9. PHYSICAL AND CHEMICAL PROPERTIES

PHYSICAL STATE	Pale yellow, liquid
APPEARANCE	Clear, colorless liquid
ODOR	Odorless or slight alcohol
SPECIFIC GRAVITY	Not available
SOLUBILITY IN WATER	Complete
pH	5.17
FREEZING POINT	Not available
BOILING POINT	Not available
MELTING POINT	Not available
VAPOR PRESSURE	Not available
VISCOSITY	<85.5mPa•s
VOLATILE CONTENT	Not available

SECTION 9 NOTES: None

10. STABILITY AND REACTIVITY

STABILITY: Under normal conditions this material is stable

HAZARDOUS POLYMERIZATION : Hazardous polymerization will not occur.



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CONDITIONS TO AVOID : None

INCOMPATIBLE MATERIALS TO AVOID : Acids, alkalis, strong oxidizing agents, and anionic surfactants

SECTION 10 NOTES: Water, moisture, or air can cause hazardous vapors to form as described in Section 2.

11. TOXICOLOGICAL INFORMATION

The following results are for the product.

ROUTES OF ENTRY: Inhalation, Skin Contact, Ingestion, Eye Contact

TOXICITY: Eye Irritation: Mildly irritating to eyes (Rabbit)

SECTION 11 NOTES: None

12. ECOLOGICAL INFORMATION

ECOTOXICOLOGICAL EFFECTS : This pesticide is toxic to fish. Do not apply to water by cleaning of equipment or disposal of pesticide.

SECTION 12 NOTES: None

SECTION 12 NOTES: None

13. DISPOSAL CONSIDERATIONS

WASTE DISPOSAL METHOD: Waste resulting from the use of this product may be disposed of on site.

SECTION 13 NOTES: None



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14. TRANSPORT INFORMATION

U.S. DEPARTMENT OF TRANSPORTATION: Not required

SECTION 14 NOTES: None

15. REGULATORY INFORMATION

SECTION 15 NOTES: None

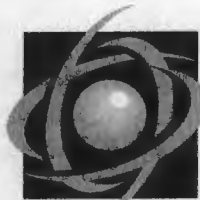
16. OTHER INFORMATION

PREPARATION INFORMATION: Prepared by NBS Technology, LLC.

DISCLAIMER: This information is offered in good faith as typical values and not as a product specification. No warranty, expressed or implied is hereby made. The recommended industrial hygiene and safe handling procedures are believed to be generally applicable. However, each user should review these recommendations in the specific context of the intended use and determine whether they are appropriate.

Date issued : 09/09/05

Replaces : 01/12/06



Goldshield™

NBS Technology, LLC

157 Skunks Misery Rd.
P.O. Box 428
Locust Valley, New York 11560

516.674.4085P

516.759.5309 F

April 25, 2007

Document Processing Desk (APPL)
Office of Pesticide Programs (7510P)
Attn. Ms. Velma Noble
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460

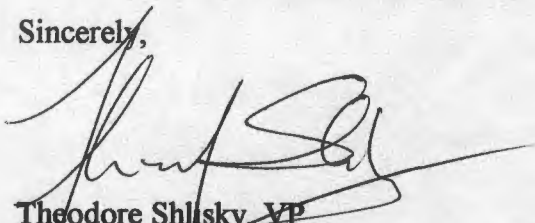
Re: Application for Goldshield 75

Dear Ms. Noble:

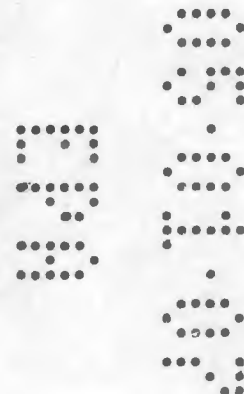
Enclosed please find our application for Goldshield 75, a diluted version of our approved Goldshield 5 product.

If you have any questions regarding this submission, please contact me at your convenience at mdvdt@aol.com. Thank you for your consideration.

Sincerely,



Theodore Shlisky, VP
NBS Technology, LLC





United States
Environmental Protection Agency
Washington, DC 20460

☒ Registration
☐ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 83075- <u>E</u>	2. EPA Product Manager Velma Noble	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Goldshield 75	PM# 31	
5. Name and Address of Applicant (Include ZIP Code) NBS Technology, LLC PO Box 428 157 Skunks Misery Road, Locust Valley, New York 11560 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 70871-1 <u>S</u> Product Name <u>BST</u> Protectorant RTU 75

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input checked="" type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Section - III

1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> Text	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container 2, 4, 8, 16, 20, 22, 36 cc / 1.5 gal / 22 gal / 55 gal drum	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Theodore Shlisky		Title COO	Telephone No. (Include Area Code) 516 674 4085
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title COO	
4. Typed Name Theodore Shlisky		5. Date 8/15/07	